

Middle East Fork Project Summary of Objection Issues and Suggested Remedies

Project Name: Middle East Fork Hazardous Fuels Reduction Project

Objector: Sprague, Brian

Objection Number: 0020

Issue 1. (LANDSCAPE/DFB) Logging outside of the WUI is unnecessary because much of what the Forest Service wants to fix ecologically is either not broken or is slowly being fixed by natural processes.

Suggested remedy: Remove the logging treatments that are outside the WUI from the preferred alternative, or change the preferred alternative to Alternative 3.

Regional Review and Response: This issue was addressed in the response to Public Concerns 63011, 3606, 3604, and 3602 in the Final Environmental Impact Statement (FEIS), Volume 2, Appendix H. In summary, the Region disagrees that the structure and function of this forest type needs no restoration. Fire suppression has eliminated 1-4 fire cycles and has resulted in increased tree density among other things. This predisposes stands to insects and disease and uncharacteristically severe fires.

Part of the Purpose and Need of the Middle East Fork (MEF) proposal is to restore fire-adapted ecosystems and restore stands affected by the Douglas-fir bark beetle to promote ecosystem function, composition and structure (FEIS, Section 1.2). The purpose of treatments outside the wildland urban interface (WUI) is to improve fire regime condition class (FRCC), restore fire-adapted ecosystems and forest health (FEIS, Section 1.2). There is an associated benefit in that strategically-placed fuel treatments (SPLATs) in the non-WUI landscape will reduce the risk of loss due to wildfire in the WUI by improving controllability (Finney, 2002) and by reducing fire severity. Pollet and Omi (2002) found that more open stands experienced lower fire severity than more densely stocked stands. Also see the FEIS, Section 3.1.6.A. To quantify this benefit, from non-WUI treatments, we added Fire Area Simulator (FARSITE) modeling to the FEIS (see pp. 3.4-40 through 3.1-46).

Non-fire treatments have effects that can mimic fire in some ways. The fire surrogate study at **University of Montana's Lubrecht Forest** as mentioned in the response to Issue 3 is helping to research the effects.

Issue 2. (DFB) Logging to try and control bark beetles is short sighted and will get us nowhere. The beetles are a natural process driven in large part by climate change and nothing can be done to stop them.

Suggested remedy: Allow the beetles to thin stands naturally. Allowing the beetles to do their thing is preferable because it will leave a more random mosaic of large and small trees with varying numbers per acre, instead of just leaving the commercially unwanted ones.

Regional Review and Response: This issue is addressed in the response to Public Concern Statement 3614. In this response there is reference to several studies that looked at insect activity in dense forest stands. The treatments proposed in Alternative 2 are intended to enhance the vigor of trees and stands to make them less susceptible to insect attacks. The treatments are not intended to "control" the beetle.

It should be noted that 73 percent of the Bitterroot National Forest is managed specifically as wild areas - Wilderness or roadless. In these areas, natural processes take place, including insects and disease. The Middle East Fork project, however, is within the 27 percent of the Forest where timber harvest and vegetative treatments are recognized as an appropriate management activity by our Forest Plan, and where such activity has occurred with some frequency throughout the past century.

Issue 3. (OG/COMM) Removing large live or dead, fire resistant Douglas-fir trees will open up the canopy enough to dry out the forest floor. Also, the smaller, less fire resistant trees will be left behind when the larger ones are removed. This will create areas that are more likely to canopy burn.

Suggested remedy: Do not remove the large live or dead trees. The ecosystem is already naturally creating the fire resistant mosaic that the Forest Service wants to see, but the Forest Service fails to acknowledge it.

Regional Review and Response: This issue is addressed in the responses to Public Concerns 63011 and 63003. In addition, Sections 3.1 and 3.2 of the FEIS discusses the effects of removing large dead trees. The effects of tree removal on evapotranspiration rates (as expressed in water yields) are discussed in the Hydrology section. A substantial reduction in tree canopy will occur with or without harvesting due to deterioration of Douglas-fir beetle-killed trees. There will be a corresponding increase in understory vegetation. The impacts are therefore short term, and the effects are predicted to be relatively minor.

Generally speaking, in all treatments the large, live, healthy trees are retained. Small trees, which contribute ladder fuels, are proposed for removal on 1,228 acres under Alternative 2. Alternative 3 proposed to do so on 348 acres.

The fire effects analysis included analysis of the silvicultural treatments prescribed for each unit including the specific vegetation, habitat type, and desired conditions. A relative increase in temperature and surface wind, as well as a decrease in fuel moisture is accounted for in the fire effects predictions. The focused look was provided, as documented on page 3.1-38 of the FEIS. The MEF analysis used Forest Vegetation Simulator-Fire & Fuels Extension (FVS-FFE) modeling that predicted changes in micro-climate due to human and natural alterations in vegetation and the resulting fire effects where modeled with FlamMap and Farsite. Efficacious fuel treatments, including prescribed fire treatments (which are not a part of "industrial logging", the term the objector uses) are dominate in Alterative 2. Caution should be used when comparing the MEF treatments to studies that do not include post-treatment prescribed fire. The information from prescriptions describes post-treatment stand conditions, and was used in the fuel models to estimate changes that might occur at the landscape level to fire behavior,

condition class, fire type, and rates of spread as a result of the implementation of the alternatives. This information is disclosed in Section 3.1.6.A of the FEIS.

At the University of Montana's Lubrecht Forest, an ongoing study is researching the effects of silvicultural prescriptions and how they can imitate some of fire's effect on the landscape. The website for the Fire Surrogate study is:

<http://www.forestry.umt.edu/research/MFCES/programs/FFSL/FFSPage/Products.html>

The Region disagrees with the objector's conclusion that treatments will "create areas that are more likely to canopy burn." For the FEIS, the Forest conducted additional analysis to better address this concern. In Section 3.1.6.A, discussion on fire behavior as a result of any of the alternatives is presented. In the section on Crowning Index/Fire Type, and Figure 3.1-7 shows the difference between the three alternatives on how much of the WUI changes from potential crown fire to ground fire. Table 3.1-3 displays the change in area with predicted flame lengths of less than 4 feet from the three alternatives. Alternative 2 results in the greatest reduction in crown fire potential and the greatest reduction in flame lengths.

Issue 4. (LANDSCAPE/COMM) The forest should not be logged to mimic "historic norms" when natural fire itself is not allowed to burn in the area. Without the reintroduction of natural fire, this will be a one-time logging project where the forest will only be in "historic norms" for a few years until the same fuel problems confront us again.

Suggested remedy: Prescribed natural fires should be allowed to burn outside the WUI. The Forest Service should have enough confidence in their work done inside the WUI to allow that to happen.

Regional Review and Response: The Forest Plan and the Bitterroot Fire Management Plan currently require that all wildland fires be suppressed promptly in the MEF analysis area. For more detail, refer also to the 4th paragraph on page 2-57 of the FEIS. Prescribed fire is proposed on 5,244 acres with Alternative 2, and on 1,239 acres with Alternative 3. Non-fire treatments have effects that can mimic fire in some ways. The fire surrogate study at the **University of Montana's Lubrecht Forest**, as previously mentioned in Issue 3, is helping to research the effects.

Issue 5. (PROCESS) The Forest Service has gone out of its way on the Middle East Fork project to undermine collaborative efforts and ignore input from many members of the Bitterroot community. This includes not listening to community members that have opposing views, ignoring or avoiding the tough questions, doing a poor job of responding to comments that were taken out of context in the FEIS, and forcibly ejecting people from public meetings that have viewpoints that the Forest Service disagrees with. Through these actions, the Forest Service has made it clear that they are only willing to listen to people who agree with their viewpoint.

Suggested remedy: The Forest Service needs to revisit these issues and make amends.

Regional Review and Response: The Forest's intentions are to treat all interested parties with respect. If that has not occurred from the objector's perspective, the Forest apologizes. With Healthy Forests Restoration Act (HFRA) projects, the emphasis is on collaboration early in the process, before National Environmental Policy Act (NEPA) even starts, to develop one acceptable proposed action. For the Middle East Fork project that early work started right after the fires of 2000. After the development of the Middle East Fork proposed action with interested parties, several conservation organizations made it clear they had opposing viewpoints and did not support the proposed action. They submitted a conceptual alternative for consideration. The Forest Supervisor chose that alternative, over one submitted by someone who had been involved in the early collaborative efforts and did support the proposed action, for analysis in the Final EIS as is provided for in the HFRA process. All three alternatives were analyzed in the NEPA analysis using the same objective measurement criteria. The Forest followed the HFRA process closely and they have worked to consider all views. The Region acknowledges there is disagreement among various interested parties on certain issues. We hope that disagreement is not misinterpreted as not willing to listen.

Regarding the statement of "forcibly ejecting people" from public meetings that have viewpoints that the Forest Service disagrees with, the objector is likely referring to the press conference held by the Forest Service for this project.

The Bitterroot National Forest held a press conference on September 22. The press conference was not designed as a public meeting, but rather was held to communicate directly with the media about the release of the Final Environmental Impact Statement for the Middle East Fork Hazardous Fuel Reduction Project and the origins of the preferred alternative, and to explain the next steps in the process leading up to a decision. No one was "forcibly ejected."

All members of the public have had multiple and extensive opportunities to express their views on the Middle East Fork project.