

## **Middle East Fork Project Summary of Objection Issues and Suggested Remedies**

**Project Name:** Middle East Fork Hazardous Fuels Reduction Project  
**Objector:** Bob Ekey, The Wilderness Society  
**Objection Number:** 0005

**Issue 1. (PROCESS) Although we submitted comments on time, our comments were never addressed in the Final Environmental Impact Statement.** We are confident that, if our comments were addressed sufficiently, the project would be different than what is currently presented in the FEIS

**Suggested remedy:** See below

**Regional Review and Response:** Comments have now been reviewed and evaluated by the Interdisciplinary Team (IDT) and response sent to The Wilderness Society (TWS) (PF-RESPONSE-002). The Wilderness Society's letter was received on June 13 but was not included in the Final Environmental Impact Statement (FEIS) because of a processing error. When the letter was printed for coding the date on the letter was a date after June 13. This was due to an option the Wilderness Society author used to have the current date printed on the letter whenever it is printed. In error, when an employee saw that this date was after the public comment period it was incorrectly put into a late comment folder. Once the error was brought to the Forest's attention, they formally responded to the issues. These comments have subsequently been reviewed and responded to by the IDT and this information will be reviewed by the deciding officer before a decision is made.

The Forest has professionally and responsibly considered all public comments. When an error or problem was found in the processing of the comments they worked conscientiously to try to correct the issue or problem in the best manner possible.

**Issue 2. (COMMUNITY) Prioritization of community protection projects.**

**Suggested remedy:** See below

**Regional Review and Response:** The Bitterroot Valley Community Wildfire Protection Plan has the Geographic Information System (GIS) information and used it in prioritizing fuel reduction work across the Valley. The priorities are reviewed annually. The Middle East Fork (MEF) project is a high priority project in the Plan. The Community Fire Plan is a valley-wide look at the population densities, infrastructure and hazardous fuel conditions. This methodology is recommended by The Wilderness Society in their paper, *Targeting the Community Fire Planning Zone* (Wilmer and Aplet, 2005). Also, see responses to Public Concern's 10006, 10008, and 10014.

**Issue 3. (DFB) Concerns regarding treatments outside the WUI. Methods used to prioritize restoration treatments are seriously flawed.**

**Suggested remedy:** See below

**Regional Review and Response:** The concern about treatments outside the Wildland Urban Interface (WUI) was addressed in the response to Public Concern Statements 63013, 63004, and 63038 in Volume 2 of the FEIS.

Part of the Purpose and Need of the 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 (Final Environmental Impact System (FEIS), Section 1.2). The purpose of treatments outside the WUI is to improve Fire Regime Condition Class (FRCC), restore fire-adapted ecosystems and forest health (FEIS, Section 1.2); however, 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. See also FEIS, Section 3.1.6.A. To quantify this benefit from non-WUI treatments the Forest added FARSITE modeling to the FEIS (see pages 3.1-40 through 3.1-46).

For prioritization also see response to Issue 2. In addition, the Douglas-fir Beetle (DFB) Hazard Rating was used to prioritize where treatments in stands outside the WUI are proposed. This process is described in the FEIS on pages 3.2-21 and 22. The objector did not acknowledge one objective for this project, managing stands infested by the Douglas-fir bark beetle, which was the driving factor behind the treatments proposed outside the WUI.

**Issue 4. (LANDSCAPE) Reliance on Fire Regime Condition Class (FRCC) represents a serious flaw.**

**Suggested remedy:** See below

**Regional Review and Response:** A landscape level determination of FRCC is required by HR 1904-9 using the methodology described in the FRCC Guidebook ([www.frcc.gov](http://www.frcc.gov)). This process was the collaboration between Bureau of Land Management, National Park Service, The Nature Conservancy, US Forest Service, US Fish and Wildlife Service, Bureau of Indian Affairs, Forest Service Fire Lab, US Geological Services, and Systems for Environmental Management.

Three peer-reviewed articles affirming the FRCC landscape classification methodology are cited in the updated References section for the FEIS: Fire Regime Condition Class and Associated Data for Fire and Fuels Planning: Methods and Applications by Hann and Strohm (2003), Development of Coarse-Scale Spatial Data for Wildland Fire and Fuel Management by Schmidt, et al (2002), and Mapping Fire Regime Condition Class: A Method for Watershed and Project Scale Analysis by Hann (2004).

**Suggested remedies:**

1. Issue a record of decision immediately implementing Alternative 3 so that communities can establish defensible space around structures.

**Regional Review and Response:** Alternative 3 does not meet any of the 3 objectives of the project, including reducing risk to the Middle East Fork Community based on the FEIS analysis as shown by the measurement criteria.

2. Perform a landscape-scale, spatial analysis to determine where housing density and wildland fuels are intermixed so that priorities can be identified and resources can be allocated accordingly.

**Regional Review and Response:** The Bitterroot Community Wildfire Protection Plan includes a prioritization process.

3. Perform a landscape-scale assessment of priorities for restoration opportunities and engage in a collaborative effort to identify priorities for opportunities for ecological restoration.

**Regional Review and Response:** The Bitterroot Community Wildfire Protection Plan already completed a prioritization process that identified high priority areas for treatment. The plan also identified the need for restoring fire adapted ecosystems and the highest priority for doing this work is in and around at risk wildland urban interfaces.