

Objection Issues

FIRE SUPPRESSION

PRIMARY OBJECTORS:

Lake Tahoe Basin Fire Chiefs, **Michael Brown and Ben Sharit**

Harold Singer

Summary of Objection Issues: The Fire Chiefs bring forth several issues related to management of fire within the WUI and ask for additions, clarification or changes to the Lake Tahoe Basin Management Unit's plan's standards, guidelines and desired conditions. As a collective, they want to ensure that the Lake Tahoe Basin Management Unit sets their priorities on preventing and managing wildfires both within the WUI and the backcountry. They are concerned that the Basin will put too much focus on protecting species dependent on old growth and post fire habitat, consequently allowing wildfires to burn more than intended, hence jeopardizing public safety and private property.

All Fire Chiefs, including the Tahoe Douglas Fire Protection District are extremely concerned about the proposed use of Minimum Impact Suppression Tactics (MIST) in backcountry and roadless areas adjacent to homes and communities. They believe that while unplanned fire may be considered good for the ecosystem and forest health, ensuring public safety and protection of property should be the first priority. Mr. Harold Singer asserts that the LTBMU did not do an adequate analysis of air quality impacts within the Basin and allowing fires to burn will add to existing problems.

FIRE SUPPRESSION

What is Required

Fire management in all areas follows the Forest Service manual for wildland fire suppression (FSM 5130). That manual clearly states, "The primary criteria for choosing fire suppression strategies and tactics are to ensure the safety of the public and firefighting resources while minimizing suppression costs, resource loss, environmental damage, and the threat of wildland fire escaping onto non-Federal lands."

Review Team Summary: SG29 cannot be implemented without an understanding of the contextual background of the rest of the LTBMU LMP as well as national policy and direction for wilderness and wildfire management. The policy of using minimum impact suppression tactics (MIST) is adapted from national policy regarding fire suppression in wilderness areas. While the Forest Service manual for wilderness management (FSM 2300) requires fire managers to “Give preference to using methods and equipment that cause the least ... [Alteration and Disturbance]”; it also provides direction to follow the Forest Service manual for wildland fire suppression (FSM 5130). That manual clearly states, “The primary criteria for choosing fire suppression strategies and tactics are to ensure the safety of the public and firefighting resources while minimizing suppression costs, resource loss, environmental damage, and the threat of wildland fire escaping onto non-Federal lands.”

The guideline (SG29) does not require a particular tactic be used; just that the fire manager selects a tactic that will minimize impacts and still meet the objectives of the fire. The fire manager must document their selection of strategies, tactics, and rationale. The fire manager can select from a full suite of tactics as warranted by the specific wildfire situation which would include consideration of fuels, weather, topography, resources available, and resources at risk. Coordinating wildfire response with local fire protection districts and departments is also a standard procedure.

Managing unplanned ignitions for resource benefits is a tactical site-specific, time-specific, decision made by the fire manager and the line officer. The decision is made with respect to the specific wildfire situation which would include consideration of fuels, weather, topography, resources available, and resources at risk. The decision is opportunistic; if the conditions are not favorable, or likely to change, that tactic is not used. The tactic of managing a wildfire for resource benefits can apply to a whole fire or just a portion of the fire. It may be used for the entire run of a fire or perhaps only for a single shift. Our national experience has been that only a small percentage of unplanned ignitions are ever managed for resource benefits.

The LTBMU LMP states (page 81), “Management-related disturbances would have only minor influences on the landscape character.” In some cases, WUI and backcountry areas do overlap. In those areas project activities should be designed to meet multiple objectives. It is possible to manage an area in such a way to modify potential fire behavior and maintain a character of scenic integrity, dispersed recreation, diverse habitats, and healthy watersheds. These are challenging goals but they are not mutually exclusive.

All fuels projects are designed to modify fire behavior and reduce hazards to communities. In Congressionally designated Inventoried Roadless Areas (IRAs), the Roadless Area Conservation Rule (RACR) prohibits mechanized treatments, necessitating the use of hand treatments in these areas. However, other Backcountry Management Areas, such as the proposed Stanford Rock Backcountry MA, would not necessarily have the same restrictions as long as proposed treatments are otherwise consistent with the Land Management Plan. The RACR also specifies that competing priorities may not

override the management priorities set forth in the rule. Other values than community protection must be considered and balance reached.

Concerns were expressed that wildfire is not mentioned in the natural hazards desired condition, even though wildfire is perhaps the greatest natural hazard in the Lake Tahoe Basin. The LTBMU Plan recognizes the gravity of the wildfire hazard and provides specific desired conditions, strategies, and standards and guidelines related to wildfire. The natural hazards DC is intended to cover natural hazards that are primarily geologic in nature.

Notification and coordination with local fire suppression agencies is a good idea and standard operating procedure for the management of all wildfires including fires that may employ the tactic of managing for resource benefits.

Biomass removal would be considered as an option in fuels projects, as described on pg. 53 of the Strategies section in the Plan. This strategy is included to address air quality impacts, and biomass removal has the added benefit of reducing treatment costs while supporting local economies.

INSTRUCTIONS BEING CONSIDERED

- Consider adding specifications for flame length and fire weather conditions in the WUI similar to those in the 2004 SNFPA ROD.
- The LMP could be strengthened by stating (perhaps as a DC or a strategy) that community protection continues to be the number one priority in choosing suppression tactics in all management areas.
- LTBMU should add the California and Nevada defensible space regulations in the Other Sources of Information section in the fire management standards and guidelines.
- The LTBMU should clarify that more than 100 feet of defensible space may be needed depending on site conditions.
- Consider adding language to clarify that ownership and land use vary throughout the WUI and through time. Management practices are applied and adjusted according to jurisdiction. It is expected that the WUI map will be amended from time to time as needed, as stated in the first paragraph of pg. 92 in the Plan.
- Consider adding language clarifying how adjacent management area direction applies to Santini-Burton and Urban Forest parcels. For example, describe how WUI defense zone direction would apply to Urban Forest Parcels located in the WUI defense zone.

- To understand DC34 as it applies to Red fir stands in the WUI, it needs to be read in combination with DC25, DC33, and DC35. Additional clarity may be achieved by adding a clause, "Where this type overlaps the WUI, fires occur as surface fire due to fuels treatments," as was done in DC31. This clause could also be added to the corresponding Jeffrey Pine DC.

REMEDY(S) PROPOSED BY OBJECTORS

- The Lincoln IRA is immediately adjacent to homes and communities in the Tahoe Douglas FPD. Therefore suppression tactics must be chosen **solely** on the basis of protecting life and property. This issue is made even more critical because of the past practice of retaining surface fuel continuity on projects within the Lincoln IRA.
- We request that the Plan state that unplanned ignitions in the WUI or where communities could be in jeopardy will be immediately suppressed. Prescribed fire can be used to achieve the same goals without relying on the vagaries of unplanned ignitions. The Plan should also state that if unplanned fires are ever to be used outside of the WUI, that the local fire suppression agency will be a party to the go/no-go decision.
- Remove all mention of unplanned ignitions and managed wildfire within the WUI.
- "We do however request that the Plan be consistent that protecting lives and property is always the primary objective regardless of land management unit designation."
- "Include reference to NAC Sec. 477.281 as the defensible space standard for allowable fuels reduction for Nevada residents."
- "The Plan should also state that if unplanned fires are ever to be used outside of the WUI, that local fire suppression agency will be a party to the go-no go decision."
- "The EIS should acknowledge that there may be isolated situation where there will be significant effects from necessary vegetation management activities. The EIS and Plan should identify under what conditions these significant effects will be allowed and mitigation measures to reduce the impact as much as feasible."
- Clearly state that where the WUI and backcountry management area boundaries overlap, that protecting life and property are the primary consideration and that fuels reduction projects in

those areas will be designed first to reduce the likelihood of high severity fire. See page 82, General Conservation Management Area description of WUI treatments.

- The vague standards for fuels reduction on urban lots can be fixed by adding a measurable and quantifiable standard stating that horizontal and vertical fuel continuity will be interrupted such that fire will burn with less than 4-foot flame lengths during 90th percentile fire weather.
- Backcountry management areas; that flame lengths will not exceed 4-feet during 90th percentile fire weather. On Page 52, the sixth bullet states “The majority of fuels reduction treatment efforts are concentrated in WUIs until initial WUI treatments are completed. WUI maintenance treatments occur as needed.” Adding “to only support 4- foot flame lengths during 90th percentile fire weather” will produce a clear and measurable goal.
- Create a measurable guideline that states that fuels reduction projects will be designed such that the wildland fire is unlikely to have flame lengths in excess of 4-feet during 90th percentile fire weather. (similar to the WUI guideline remedy below)
- SG 22: Insert “from 100-300 foot radius, depending on fire hazard” into the existing sentence” and DC 26 “insert 100 to 300 feet of non-federal structures into the paragraph.”
- State that the WUI map may be amended if deemed necessary by federal, state and local land managers.
- Include a measurable goal for fuels reduction on Santini-Burton parcels and in the WUI in general that states that fuels reduction projects will be designed and maintained to limit flame lengths to 4-feet during 90th percentile fire weather. Also, the Draft Environmental Impact Statement included similar tables of objectives for all of the alternatives. Obj45 in the DEIS states: *Conduct follow-up fuels treatments every 10-15 years in forested stands and every 5-7 years in brush-dominated stands.* OBJ45 in the plan should mirror the DEIS objective.
- The Plan should overtly state that community protection is the primary goal of fuels reduction even within roadless areas. The Plan should also make clear that modifying fuels including interrupting horizontal and vertical fuel continuity such that fire will burn with less than 4 foot flame-lengths during 90th percentile fire weather.

- The Plan must acknowledge the presence of homes and communities immediately adjacent to backcountry management areas by clearly stating the vegetation management activities within the WUI, whether in a backcountry management area or not, will be designed to modify fire behavior and protect lives and property first.
- "We also believe that any action such as designating "backcountry areas" near communities that will increase fire suppression and structure protection costs must include a provision for the Forest Service to pay these costs."
- Work with the local fire protection districts and departments to identify those areas in backcountry management areas where MIST is not appropriate. See also SG35 for an example of proximity-based management that would be effective for use of MIST in backcountry management areas.
- Include wildfire prominently in DC3 and clearly state that wildland fire is the primary natural hazard in the Lake Tahoe Basin.
- Consider an alternative to prescribed fire treatments that result in less air emissions that may include significantly more biomass removal or other action resulting in less material that would be left to burn in a prescribed fire.
- Develop a new S & G that requires biomass removal that is in excess of that needed for ground cover or total mass per acre (includes standing and on-ground material except in situations where access would create other environment concerns or effects This would also require more open-ended contracts that would incorporate coming back in out years to haul material when sites could accept the biomass. It is typical that burn piles sit for three to five years before they are burned. This creates a window of opportunity that is currently not utilized to reduce air emissions further.