



# Sierra Forest Legacy

*Protecting Sierra Nevada Forests and Communities*



June 25, 2014

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Re: Resolution of Fire Management Concerns Related to the LTBMU Revised Land and Resource Management Plan

To the Review Team:

On June 13, 2014 Sierra Forest Legacy and the Fire Chiefs of North Lake Tahoe Fire Protection District and Tahoe Douglas Fire Protection District met to discuss several objections raised by the Tahoe Basin Fire Chiefs and Tahoe Douglas Fire Protection District. During the meeting we discussed concerns for managing natural ignitions in the threat zones of the wildland urban interface (WUI) around the Basin, in particular the WUI adjacent to the Lincoln Interim Roadless Area (IRA) located in the Tahoe Douglas Fire Protection District.

The Basin Fire Chiefs were highly concerned with managing unplanned ignitions in the WUI threat zones because fuel reduction projects completed in WUI on Forest Service lands had higher fuel loading compared to the fuel reduction projects administered by the fire districts. Their standard is that flame lengths should be less than four feet over 75% of the project area under 90% percentile weather conditions. They found that some Forest Service projects did not meet these conditions. We also discussed minimum impact suppression tactics within the backcountry management areas with emphasis on areas that are near or adjacent to the WUI. It was clear that under certain red flag weather conditions, minimum impact suppression tactics (MIST) might not be an appropriate response. Sierra Forest Legacy clarified that MIST allows for more aggressive suppression tactics when necessary for fire suppression. Our final point of discussion was on the inclusion of Nevada State defensible space standards in the forest plan.

The current standard in Nevada is to meet defensible space standards within 100 to 200 feet from a structure depending on the slope. Steeper slopes would require more defensible space to limit radiant and convective heat transfer as well as flame contact with structures. In the sections below, we will summarize our discussions for each of the areas and offer recommendations moving forward in the objection process.

#### Managing unplanned ignitions in the threat zone

Sierra Forest Legacy outlined the current policy for managing unplanned ignitions and how the agency defines unplanned ignitions. As a result, we agreed that the term unplanned ignitions was a bit vague in the Revised Lake Tahoe Basin Land Resource Management Plan. We outlined the current definitions for unplanned ignitions from the Guidance for Implementation of Federal Wildland Fire Management Policy (2009) defining unplanned ignitions as natural and human caused ignitions, however, current standards for the USDA Forest Service from the Interagency Standards for Fire and Aviation Operations (2014) are for 100% suppression for all unplanned ignitions that are caused by humans. We further discussed maintenance on fuel breaks in the WUI zones and clarified that it was not the intention of the Forest Service to only use unplanned ignitions on fuel breaks. We believe that the forest plan intends that prescribed fire be a tool for maintaining fuel breaks and surface fuel accumulations.

#### ***Recommendation***

No action required. Current Forest Service policy is that unplanned ignitions caused by humans will be suppressed and not managed for resource benefit (Interagency Standards for Fire and Fire Aviation Operations 2014).

The major objection with managing unplanned ignitions is that there is no clear understanding of how the Forest Service intends to communicate to the Fire Chiefs its decision to use unplanned ignitions. The land management plan lacks a clear direction for collaboration and coordination with outside fire personnel for the use of unplanned ignitions. The Fire Chiefs were clear during the meeting that they want to be a part of the discussion and decision making process for managing a natural ignition within the WUI threat zone. This is critical for their mission to protect lives and property. We understand that there are current memorandums of understanding (MOU) between the local Fire District and the Forest Service. It is not well understood if the current MOU outlines the communication and coordination on managing unplanned ignitions.

#### ***Recommendations***

Include a standard for interagency and intergovernmental cooperation, suggested language:  
*Interagency and intergovernmental planning occurs across boundaries to promote fire as an ecological process on a landscape level<sup>1</sup>*

As a *Best Management Practice*, the Forest Service should including a guideline to participate in the daily 1300 smoke calls. This would support interagency intergovernmental planning efforts for prescribed fire and managing unplanned ignitions.

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<sup>1</sup> Britting et al. 2012 National Forests in the Sierra Nevada: A Conservation Strategy. IV.A. Restoring Fire As An Ecological Process

We also recommend that a guideline be added to direct the completion of an annual review with fire district staff of post treatment results for fuels reduction projects implemented within the WUI. The review should include pre and post fire behavior modeling results and determine if the fuels treatments are in a condition to safely allow the use of unplanned ignitions. This would give an opportunity for input from the local Fire Chiefs on the areas where the management of unplanned ignitions was being considered and a chance to air any concerns they may have in advance of an ignition.

#### Minimum Impact Suppression Tactics (MIST) in Backcountry Management Areas

We briefly touched on MIST and concerns were raised on the proximity of WUI to backcountry management areas. The strategies for Fire Management in the Forest Plan outline protection of human life as the most important objective during a fire (Forest Plan, p. 53). However, the forest plan does not consistently state that the primary objective for fire management is the protection of human life. Under certain conditions, it may be appropriate to use more aggressive fire suppression tactics rather than MIST. It was understood and agreed that MIST does include more aggressive tools if and when necessary. The concern remained over the lack of transparent language that stated lives and property were the number one priority during a wildfire incident under conditions that could be catastrophic to the surrounding communities.

#### ***Recommendation***

In the FEIS (p. 3-233) it is clear that the priority that backcountry overlap with WUI, community protection is priority; however, there is no clear point made on community protection within the forest plan itself. In the plan (p. 81) Backcountry Management Areas should include discussion on the overlap areas of backcountry management areas with WUI, include considerations for community protection being the highest priority during any wildfire incident and the appropriate action will be taken to ensure protection of lives and property as the primary objective.

#### Clarify defensible space standards

The Lake Tahoe Basin Fire Chiefs have been working diligently on unified defensible space requirements for the communities and the adoption of a common standard around the Lake Tahoe Basin. They are promoting fire adapted communities and wildfire preparedness to all the communities in the Lake Tahoe Basin. The forest plan only specifies 100 feet around structures does not account for steep slope position that increases fire rate of spread and that may require treatment up to 200 feet<sup>2</sup>.

#### ***Recommendation***

Amend standard and guideline 22 and standard and guideline 171 to include 100 feet - 200 feet of defensible space where necessary as recommended in the defensible space distance table in the Fire Adapted Communities: The Next Steps in Wildfire Preparedness for the Lake Tahoe Basin<sup>2</sup> (p.14).

#### Measurable standard for fuels reduction projects

There is not a clear measurable standard for reducing fire line intensity and flame lengths. In the

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<sup>2</sup> Fire Adapted Communities: The Next Step in Wildfire Preparedness Lake Tahoe Basin – a joint sponsored publication from Nevada Division of Forestry, North Lake Tahoe Fire Protection District, USDA Forest Service, Lake Tahoe Basin Fire Chief Association, and University of Nevada Cooperative Extension.

Record of Decision (2004) there are standards for fuels reduction projects in WUI threat zone that include flame lengths less than 4 feet and rate of spread reduced to at least 50% post treatment (p. 41). In the WUI threat zones, the Fire Chiefs expressed a critical need for a standard to address fuels reduction projects. The North Lake Tahoe Fire Protection District designs all fuel hazard reduction projects to meet the following standard: *under 90<sup>th</sup> percentile weather conditions, project will have flame lengths under 4 feet over 75% of the units.*

***Recommendation***

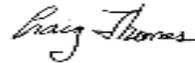
Consider the inclusion of clear and measureable standards for hazard fuels reduction projects within the WUI threat zones. Having clear and measurable standards will clarify the post-treatment conditions that planned and unplanned ignitions could encounter on the landscape and would be a factor the Forest Service would consider when making a decision to manage unplanned ignitions.

We recognize that the Lake Tahoe Basin is unique in its amount of public lands adjacent to communities. We acknowledge the challenges and benefits of using planned and unplanned ignitions in the Lake Tahoe Basin. We appreciate the desire from the Forest Service to hear the concerns of the Fire Chiefs and to work towards a resolution. If the Forest Service considers the above recommendations, in particular, coordination and cooperation for managing unplanned ignitions, we believe this will strengthen the relationship between the Fire Chiefs and the Forest Service in the future.

Sincerely,



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