

# TAHOE BASIN FIRE CHIEFS

June 26, 2014

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Lake Tahoe Basin Management Unit  
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## **Re: Objections to Revised Land and Resource Management Plan dated November 2013**

The Tahoe Basin Fire Chiefs and Tahoe Douglas FPD would like to applaud the Forest Service's new planning process and have enjoyed being a party to development of a the new Land and Resource Management Plan (Plan). We believe that the current planning process will lead to the development of a better Plan and that the public will be well served by the collaborative process.

### **Instructions Being Considered**

The Tahoe Basin Chiefs and Tahoe Douglas FPD have reviewed the Instructions Being Considered within the Objection Issues – Fire Suppression document and offer the following comments:

- *Consider adding specifications for flame length and fire weather conditions in the WUI similar to those in the 2004 SNFPA ROD.*
  - Comment – We support this Instruction and believe that is particularly important in the Defense Zone, regardless of Backcountry or Inventoried Roadless Area (IRA) designation. We have provided documentation showing that past treatments did not treat surface fuels immediately adjacent to homes because of Backcountry status.
  - Comment – The Tahoe Basin Chiefs and Tahoe Douglas FPD understand and implement strategically placed treatments within the threat zone that might not meet a 4-foot flame length during 90<sup>th</sup> percentile fire weather standard. This should be allowed under the Plan.

- *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.*
  - Comment – We agree with this Instruction. Our concern is that anytime MIST or other tactics are suggested or required is that over time institutional memory fades and the MIST recommendation becomes a de facto requirement. There are Backcountry Management Areas within the Defense Zone of Tahoe Douglas FPD, Lake Valley FPD, Meeks Bay FPD and North Tahoe FPD. MIST tactics, particularly if they evolve to mirror fire suppression tactics in wilderness areas, will jeopardize life and property.
  
- *LTBMU should add the California and Nevada defensible space regulations in the Other Sources of Information section in the fire management standards and guidelines., and*
- *The LTBMU should clarify that more than 100 feet of defensible space may be needed depending on site conditions.*
  - Comment – We agree that these regulations and standards should be added to the Plan as it demonstrates that the local jurisdictions are actively supporting the creation of defensible space and the enforcement of defensible space standards. It is important that the fuels reduction work being completed by the Forest Service be augmented by defensible space work completed in the community. Adding such language clearly links the work in the community to the work being done under the Plan.
  
- *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.*
  - Comment – We agree that language should be added to the plan indicating that the WUI map can and likely will be updated as new information is obtained and as management practices adapt. It should also be noted that the Lake Tahoe Basin Management Unit works in a unique environment compared to other forests. In the Lake Tahoe Basin, Forest Service land, state land, local government land and private land can all be present in very small areas. This point also speaks to the use of unplanned ignitions within the WUI or the use of MIST. It should always be assumed that land owners other than the Forest Service will be affected by decisions to use MIST or unplanned ignition.

- *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.*
  - Comment – We agree that clarity could be provided by distinguishing the WUI from “general forest” desired conditions. As discussed above, it is imperative for the protection of life safety and property that the defense zone will only support 4 foot flame lengths during 90th percentile fire weather.

### **Unplanned Ignition in the Wildland Urban Interface**

Missing from the “Instructions Being Considered” is language prohibiting the use of unplanned ignition in the WUI. Unplanned ignition in the WUI will unnecessarily jeopardize life safety and property. The Tahoe Basin Chiefs and Tahoe Douglas FPD encourage the Forest Service to prohibit unplanned ignition in the WUI for the following reasons:

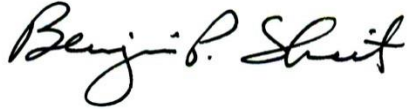
- 1) The WUI in Lake Tahoe has been designed to provide protection to communities from wildland fire, but was not designed with unplanned ignition in mind. Allowing unplanned ignition within the newly modified Lake Tahoe WUI means that wildland fire will be present within very close proximity to homes. This proximity to homes means that it is impossible for land managers to carefully evaluate all of the factors that must be considered to make a go/no-go decision for the use of unplanned ignitions. Unplanned ignitions from lightning are particularly dangerous because thunderstorms have strong and unpredictable downdraft winds. Time is of the essence when working in the WUI, and thus the only decision that can be responsibly made in the WUI is to immediately suppress the fire. Allowing the possibility of using unplanned ignitions can negatively affect suppression response times and put lives and property at unnecessary risk.
  
- 2) Currently there is no way for local government jurisdictions to be a party to the decision to use unplanned ignitions. However, local government is responsible for paying all costs associated with structure protection even when the decision is made to allow a fire to burn in the WUI. As soon as the Forest Service makes the decision to use unplanned ignition, local government is responsible for the costs associated with structure protection. We must also immediately reallocate our resources to structure protection, thus affecting resource allocations designed in our Standards of Cover plans. In this way, the Forest Service then determines where local government allocates resources, without first consulting the local jurisdiction.

### **Conclusion**

The Tahoe Basin Chiefs and Tahoe Douglas FPD offer our sincere congratulations to the LTBMU team that drafted the Land and Resource Management Plan. This is a herculean task and was well done. This letter addresses objections we have to the current version of

the plan, but we hope it is recognized that the vast majority of the plan has our support and we do believe it will serve the Lake Tahoe Basin Management Unit well into the future.

Sincerely,

A handwritten signature in black ink that reads "Ben Sharit". The signature is written in a cursive style with a large, prominent initial "B".

Ben Sharit, Fire Chief  
Representing Tahoe Douglas FPD  
PO Box 919  
Zephyr Cove, NV 89448

A handwritten signature in black ink that reads "Mike Brown". The signature is written in a cursive style with a large, prominent initial "M".

Mike Brown, Fire Chief  
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