

Tahoe Basin Fire Chiefs

January 17, 2014

Lake Tahoe Basin Management Unit - Forest Plan Objections
U.S. Forest Service - Lake Tahoe Basin Management Unit
35 College Drive
South Lake Tahoe, CA 96150

Re: Objection to Revised Land and Resource Management Plan dated November 2013

Attention: Mr. Randy Moore, Regional Forester
Ms. Nancy Gibson, LTBMU Forest Supervisor
Mr. Jeff Marsolais, Deputy Forest Supervisor

The Tahoe Basin Fire Chiefs (Chiefs) formally object to the adoption of the Revised Land and Resource Management Plan – Lake Tahoe Basin Management Unit (Plan). Our objections are confined to 1) areas where we made public comment to the Draft Environmental Impact Statement (DEIS); and 2) areas where changes were made from the DEIS to the Plan. Had the DEIS included the new language then the Chiefs would have previously submitted comments on the new language. The attached comments should be considered part of our formal objection.

We do have substantive concerns. However, we also want to clearly communicate our appreciation of the work done by Lake Tahoe Basin Management Unit staff in preparing the Revised Land and Resource Management Plan. We recognize it has been a significant undertaking over many years. The Chiefs and our districts/departments look forward to continuing our work with the U.S. Forest Service as we collaborate to protect life and property in the Lake Tahoe Basin.

Policy Perspectives

The management of federally owned forest lands around Lake Tahoe by the USDA Forest Service (LTBMU) impacts all fire agencies in the region. There are land management, fuels management and fire suppression standards and guidelines within the preferred alternative and within the Plan that, if implemented, could negatively impact lives, property and public safety. Our technical comments identify these impacts and concerns. **We strongly believe that fire behavior modification should be the primary objective of fuels management in order to protect life safety and property for treatments in the WUI.**

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 those costs. We believe fire and fuels management within the WUI is compatible with vegetation and habitat restoration and improvement, however, these must be secondary outcomes within the WUI. In the Plan SG29 creates a guideline to use MIST tactics during fire suppression in backcountry management areas. Many of these backcountry management areas are immediately adjacent to communities. Adopting guidelines that would hamper fire suppression tactics near homes is not consistent with national fire suppression policy. The Plan must include planning for fuels reduction and

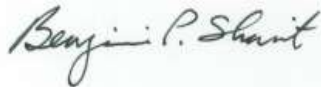
fire suppression within the WUI portions of backcountry management areas that includes effective fuels reduction and suppression tactics designed to protect life and property first.

The Tahoe Basin Fire Chiefs support the responsible use of prescribed fire to maintain fuels reduction projects and to restore forest health. However we do not support a plan that relies on unplanned fires for the maintenance of fuel breaks within the WUI. We also request that managed fire within the WUI be removed from possible activities. The type of analysis that must be completed in order to allow an unplanned fire to burn in the WUI is too complex to conduct under the time and resource constraints imposed by wildland fires. If an unplanned ignition is going to be used to meet resource objectives then the local fire suppression agency must be a party to the decision.


The fire weather analysis in the DEIS shows that there are a limited number of burn days where prescribed fire can be used in the Tahoe Basin. Likely there are not enough burn days to maintain all of the fuels reduction projects that are being implemented in the 10-Year Strategy. Therefore, we support the Forest Plan's objectives to use a combination of prescribed fire and forest thinning to maintain fuel reduction project efficacy.

We look forward to participating with USFS representatives in the next steps of your formal Plan objection process.

Sincerely,



Chief Benjamin P. Sharit
Tahoe Douglas Fire Protection District



Chief John B. Pang
Meeks Bay Fire Protection District



Chief Gareth S. Harris
Lake Valley Fire Protection District



Chief Michael D. Brown
North Lake Tahoe Fire Protection District



Chief Michael S. Schwartz
North Tahoe Fire Protection District



Chief Jeffrey Meston
City of South Lake Tahoe Fire Department



Chief Gary Gerren
Fallen Leaf Lake Fire Department

Comments

Comment 1

Part 1 - Revised Land and Resource Management Plan – Vision

DC3. *Risks to life and property from natural hazards are reduced to acceptable levels through identification/mapping, avoidance of activities and development in hazardous areas, and modification of existing development to lessen potential impacts. Natural hazards include flooding, mass wasting (landslides, etc.), earthquakes, liquefaction, seiches, avalanches and volcanic hazards. (Pathway)*

Why this is an issue: Wildland fire is not mentioned as a natural hazard. The Lake Tahoe Basin Chiefs must insist that planning for and mitigating wildfire must be primary goals of the Lake Tahoe Basin Management Unit. If wildland fire is not even mentioned as a natural hazard then it could be viewed as a secondary risk that does not require immediate action.

Solution: Include wildfire prominently in DC3 and clearly state that wildland fire is the primary natural hazard in the Lake Tahoe Basin.

Comment 2

Introduction to Forest Vegetation, Fuels and Fire Management, Page 19 - Vision

Introduction: *Comstock-era logging, fire exclusion, livestock grazing, and other past management practices have significantly altered ecological conditions throughout the Lake Tahoe Basin. These practices have contributed to increased forest vulnerability to drought, disease, and insect outbreaks, as well as high severity, stand-replacing wildfire, increasing risks to communities, natural resources, and scenic quality. In addition, fire exclusion has resulted in encroachment of shade-tolerant conifers into meadows and aspen stands, and their ecological and scenic values are at risk. As our understanding of ecosystem processes has improved, it has become apparent that a more complete integration of restoration efforts is necessary to successfully restore natural ecological processes and enhance and maintain the scenic quality for which the Lake Tahoe Basin is renowned, while reducing wildfire hazard to communities and key wildlife habitats.*

Fifth Paragraph – Backcountry Management, Page 81

Similarly, Backcountry lands may be occasionally influenced by management activities to support forest health, improve habitat, and reduce fuels. Management-related disturbances would have only minor influences on the landscape character.

Why this is an issue: The introduction paragraph is a perfect recitation of how the forests of the Lake Tahoe Basin have become grossly overstocked and the current forest structure supports high severity, stand replacing wildfire that places communities, natural resources and scenic quality at-risk. Then in the backcountry management section the Plan states that any treatment will be only perfunctory and is thereby

unlikely to modify fire behavior. There is no acknowledgement that there are homes immediately adjacent to backcountry management areas.

Solution: 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.

Comment 3

DC25. *Unplanned fires in the Wildland-Urban Interface (WUI) and in Jeffrey pine/mixed conifer forests tend to spread slowly to moderately, depending on winds, and burn as a surface fire. Occasional single tree or group torching might occur when the fire burns through a dense clump of young trees. This burning thins the stand, promotes rapid growth of surviving trees, and creates occasional large snags by killing adjacent large trees. Unplanned fires occurring outside of the WUI in densely stocked fir or lodgepole pine forests may produce intense, stand replacing events consistent with natural fire regimes.*

Why this is an issue: This desired condition indicates that unplanned fire in the WUI is desirable from a forest health standpoint but ignores the fact that using unplanned ignitions in the WUI will create excessive risk for communities.

Solution: The Plan must clearly 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. If unplanned fires are ever to be used, outside of the WUI, then the local fire suppression agency must be consulted and agree to the strategy.

Comment 4

DC26. *WUI zones (Map 7), are open canopied and dominated primarily by larger, fire-tolerant trees (e.g. thick-barked, self-pruning pine species). The WUI incorporates patterns of fuel condition that modify wildfire behavior by slowing large fire spread and reducing overall fire intensity and severity. Defensible space exists for all structures on Forest Service administrative sites, Forest Service permit authorization sites, and within 100 feet of non-federal structures.*

Why this is an issue: Defensible space treatments must extend a minimum of 100 feet and up to 300 feet from structures depending on slope, aspect, fuel type and wind alignment. A flat 100 foot prescription for defensible space is inadequate in many areas.

Solution: Insert 100 to 300 feet of non-federal structures into the paragraph.

Comment 5

DC28. *Natural ecological processes occur with little direct human influence. Fire and fire surrogates approximate a fire return interval of 7-20 years in Jeffrey pine stands. Stand replacing fire occurs on an average of 5% of burned acres, with occasional more severe fires driven by extreme weather. Fires burn primarily on the forest floor and do not spread between canopy trees as active crown fire. Occasional crown torching leads to forest openings and generation of large snags. Except in extremely rare events, contiguous areas of crown mortality after fire are less than 5 acres in size. High severity patches are principally confined to higher density, closed canopy stands and/or warm, upper slopes. Frequent, low severity fires are characteristic in this type; including throughout spotted owl and goshawk protected activity centers (PACs) and home range core areas (HRCAs).*

DC34 also ignores the WUI for high severity fire in red fir forests. See solution below.

Why this is an issue: This desired condition states that a forest structure that would support catastrophic wildfire driven by extreme fire weather is acceptable even in the WUI and immediately adjacent to homes.

Solution: Add the statement “outside of the WUI” prior to Stand replacing fire occurs... See DC31 for an example of inclusion of WUI into the description.

Comment 6

Missing Desired Condition. Fuel treatments on Santini-Burton parcels and within the WUI in general will be designed to interrupt horizontal and vertical continuity of forest fuels and will only support 4-foot flame lengths during 90th percentile fire weather.

Why this is an issue: None of the Desired Conditions in the plan overtly state that fuels reduction projects will be designed and maintained in-perpetuity to minimize flame lengths and fire behavior in the WUI.

Solution: Set a desired condition of forest fuels within the WUI, including urban lots and 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.

Comment 7

Obj44. *Complete initial fuels reduction and forest health restoration treatments as needed on all urban forest parcels by 2019.*

Obj45. *Conduct follow-up fuels treatments every 10-15 years in urban forest parcels.*

Why this is an issue: The objectives for fuels reduction on Santini-Burton parcels are vague.

Solution: 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.

Comment 8

Backcountry Management Area Management Concept, Page 81. The backcountry management areas in many cases are immediately adjacent to the communities of the Lake Tahoe Basin and many hundreds privately owned developed parcels border the backcountry management areas.

Why this is an issue: The backcountry management area goal that states “management-related disturbances would have only minor influences on the landscape character.” This leads the reader to conclude that protecting life safety and property are secondary considerations in backcountry management areas.

Solution: 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.

Comment 9

Table 5. Suitable Uses and Management Activities by Management Area. Table 5 shows that managed wildfire is a suitable management activity in backcountry management areas, general conservation areas and Santini-Burton parcels even within the WUI.

Why this is an issue: Using prescribed fire is necessary to achieve fuels reduction goals in the WUI but it is a complex and risky activity. Planning to use unplanned ignitions in the WUI substantially increases the risk of prescribed fire to intolerable levels.

Solution: Confine the use of managed wildfire to areas outside of the WUI that do not jeopardize communities. Also, any use of unplanned ignition must be mutually agreed to by the local fire suppression agency.

Comment 10

Resource Map Overlays. The description of the Wildland Urban Interface Map Overlay on Page 92 does not state that the WUI map may be amended periodically and is being amended today.

Why this is an issue: The LTBMU, state land managers and local fire districts are currently working to update the WUI map. The new map and any future revisions should be incorporated into the Plan.

Solution: State that the WUI map may be amended if deemed necessary by federal, state and local land managers.

Accolade: The description of how the urban core is a part of the defense zone and that fuels reduction in urban areas will be consistent with treatments in the defense zone is very good and should be retained verbatim.

Comment 11

SG22. *Provide up to a 100 foot radius of defensible space around all structures on all USFS structures or USFS permitted structures as well as for non-federal structures adjacent to National Forest System lands. [Guideline]*

Why this is an issue: Defensible space may vary from a minimum of 30 feet in low fire hazard areas and up to in excess of 300 feet in extreme fire hazard areas.

Solution: Insert “from 100-300 foot radius, depending on fire hazard” into the existing sentence.

Comment 12

SG23. *In conifer forest types, design fuel reduction treatments so that post treatment fuels conditions will not sustain crown fire. [Guideline]*

Why this is an issue: This Standard and Guideline is vague. It is understood that there will be limited torching and crowning even in effective fuels reduction projects. So this guideline is not achievable. Additionally, it is necessary to set a fire weather metric when considering flame length and fire behavior or it would be possible to apply the guideline to weather conditions such as during a rain storm where fire is unlikely to even burn.

Solution: 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.

Comment 13

SG26 and SG27. *Allow unplanned ignitions on NFS lands in all fire management units (FMUs), except the WUI defense zone, to meet forest plan desired conditions and objectives, when safety issues have been resolved and smoke impacts can be minimized. [Guideline]*

Why this is an issue: The safety issues associated with unplanned ignitions and managed wildfire within the WUI **cannot be resolved.**

Solution: Remove all mention of unplanned ignitions and managed wildfire within the WUI.

Comment 14

SG29. *Apply minimum impact suppression tactics (MIST) during fire management actions in wilderness and backcountry management areas. [Guideline]*

Why this is an issue: Backcountry management areas include areas within the WUI and also immediately abut developed homes within communities. Suppression tactics in the WUI must be chosen solely on the basis of protecting life and property regardless of the presence of a backcountry management area.

Solution: 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.

Comment 15

SG171. *Allow adjoining property owners to conduct authorized fuels reduction activities annually on portions of Urban Forest Parcels that are located within 100 feet of a structure; to a level that allows compliance with California State Law PRC 4291 while providing resource protection to NFS lands. [Guideline]*

Why this is an issue: Nevada has adopted a defensible space standards published in the International Wildland Urban Interface Code, 2009 at NAC § 477.281.

Solution: Include reference to NAC § 477.281 as the defensible space standard for allowable fuels reduction for Nevada residents.