

TAHOE DOUGLAS FIRE PROTECTION DISTRICT

Ben Sharit, Fire Chief
Mark Novak, Assistant Chief



Steve Seibel, Chairman
Ann Grant, Vice Chairman
Brad Dorton, Trustee
Kevin Kjer, Trustee
Mike Bradford, Trustee

January 20, 2014

USDA Forest Service, EMC
Attn: Judicial & Administrative Review Group
1400 Independence Ave., SW,
Mail stop Code: 1104
Washington, DC 20250-1104

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

Attention: Mr. Tom Tidwell, Chief of the Forest Service
Mr. Randy Moore, Regional Forester
Ms. Nancy Gibson, LTBMU Forest Supervisor
Mr. Jeff Marsolais, Deputy Forest Supervisor

Tahoe Douglas FPD would like to applaud the Lake Tahoe Basin Management Unit's (LTBMU) staff's efforts to produce the Revised Land and Resource Management Plan – Lake Tahoe Basin (Plan). While we do have objections to several Conditions, Standards and Guidelines, the vast majority of the Plan is very good and will serve the LTBMU and the public well. Our comments are as follows:

DC25 states: 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.

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. It just isn't plausible that the safety considerations for using managed wildfire in the WUI can be resolved quickly enough to actually use the unplanned ignition. 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-nogo decision.

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The Plan provides for the continued recognition of the Lincoln Inventoried Roadless Area and goes further to designate the Lincoln IRA as a backcountry management area on Page 81 of the Plan. The Plan states:

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.

The Plan appears to continue the current approach to fuels management within the Lincoln IRA where surface fuel modification is not a part of the prescription. The proximity of the Lincoln IRA to communities in the Tahoe Douglas Fire Protection District (Fire District) and the limited treatment of forest fuels, particularly surface fuels, in the Lincoln IRA gravely concerns the Tahoe Douglas Fire Protection District. Page 3-233 of the Final Environmental Impact Statement states:

*Impacts of these recommendations on fuels indicators or programs will be minimal since we do not conduct significant fuels management in roadless or wilderness areas. **The exception is where backcountry overlaps with WUI. In these cases, community protection is still the number one priority.** Where treatments in backcountry are required for community protection, treatment methods may be modified to be consistent with Backcountry Management Emphasis suitable uses. But fire behavior objectives will still be met. All of the communities surrounding the Lincoln IRA have been rated as being at "high" or "extreme" risk from catastrophic fire in the Community Wildfire Protection Plans for the Fire District. [Emphasis added].*

However, nowhere in the Plan do we see it so clearly stated that community protection is the primary priority as in the FEIS. The Plan seems to continue past practices that have resulted in ineffective fuels reduction projects in our fire district. As one example, the Spooner Project implemented in 2011, left the community of Logan Creek exposed to catastrophic fire because no surface fuel treatment was included in the project. It was explained to us that brush and surface fuel modification was not permitted in roadless areas. The end result is that there are continuous surface fuels leading from the Lincoln IRA up to within feet of homes. Therefore we must insist that the Plan 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.

Along with fuels reduction in roadless areas, we must object to the use of MIST tactics in roadless areas near communities. SG29 states: *Apply minimum impact suppression tactics (MIST) during fire management actions in wilderness and backcountry management areas. [Guideline].* 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.

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The above comment concerning a clear standard for fuels reduction in backcountry management areas also applies to Santini-Burton parcels. Currently the Plan has no quantifiable standard for fuels reduction on urban lots. The result is that projects being implemented today do not have surface fuel prescriptions and therefore will not modify fire behavior to acceptable levels. 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.

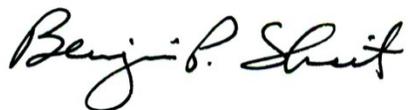
SG171 states: Allow adjoining property owners to conduct authorized fuels reduction activities annually on portions of Urban Forest Parcels that are located within 100 feet of a structure; to a level that allows compliance with California State Law PRC 4291 while providing resource protection to NFS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

Nevada has adopted the defensible space standards of the International Wildland Urban Interface Code, 2009 at NAC § 477.281. Please include reference to NAC § 477.281 and PRC 4291 in the Plan.

The choice to modify standard fuels reduction practices in roadless areas and urban lots creates a substantial liability for the Tahoe Douglas FPD. Local jurisdictions are typically responsible for the cost of structure protection during wildland fires. However, it is foreseeable that the retention of surface fuels in roadless areas is substantially contributing to the expected cost associated with structure protection. If the LTBMU continues to choose to leave continuous fuels immediately adjacent to homes then we must insist that any costs of protecting those homes be borne by the LTBMU.

We understand that re-writing a forest plan is a complex process and that over 18,000 public comments were received many with points-of-view that cannot be reconciled. We do recognize that pulling together those comments into a single document is truly a herculean task, one that has been accomplished in the Plan. We do however also request that the Plan be consistent that protecting lives and property is always the primary objective regardless of land management unit designation.

Sincerely,

A handwritten signature in black ink that reads "Benj. B. Sharit". The signature is written in a cursive, flowing style.

Ben Sharit, Fire Chief

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