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December 5, 2016

Ian Reid
District Ranger
North Fork John Day Ranger District
PO Box 158
Ukiah, OR 97880

Re: Ten Cent Community Wildfire Protection Project DEIS

Sent via email to: comments-pacificnorthwest-umatilla-northfork-johnday@fs.fed.us and comments-pacificnorthwest-umatilla-johnday@fs.fed.us

Dear District Ranger Reid:

The following are comments from Wilderness Watch on the DEIS and its associated documents and appendices for the Ten Cent Community Wildfire Protection Project. These comments focus on the proposal for the North Fork John Day Wilderness, which is only part of the proposal. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. Also attached are our earlier scoping comments.

Wilderness

As noted in our scoping comments, these projects would allow manipulation and trammeling of the North Fork John Day Wilderness that violate the Wilderness Act. Our organization supports allowing lightning-caused fire to play its natural role in the Wildernesses but the Forest Service plan proposes to significantly manipulate the Wilderness in ways that will harm wilderness character. We address this concern in more detail below.

Section 4d1 of the Wilderness Act, while allowing measures to control fire, does not address the issue of manager-ignited prescribed fires. This is a misreading of the Act and conflicts with the Forest Service Manual which recognizes there is no broad discretion to light fires in Wilderness (see FSM 2324.22 parts 6, 7 and 8).[1]

[1] That said, while the Manual puts constraints on the use of management-ignited prescribed fire—constraints that are largely ignored in this EIS--we would note that manager-ignited prescribed fire is at odds with the Wilderness Act, regardless of Manual direction.

There are assumptions throughout the EIS that fuel amount drives large fires. We addressed this fallacy in our earlier scoping comments and provide additional comment in the section on NEPA. Another assumption is that fire suppression (assumed to be effective) has resulted in an unnatural forest and therefore trammeling is necessary to correct past trammeling. This elevates some ambiguous definition of naturalness above wildness or untrammeled wilderness, which is contrary to the Wilderness Act.

The Forest Service has not demonstrated that ecosystem modification or modification of natural processes is "the minimum requirement for administering the area as wilderness." The main thrust of a wilderness-based justification in the DEIS and the associated materials is the agency's illogical allegation that these actions, which are admittedly actions that trammel, will make the Wilderness untrammeled. The documents also allege that manager-ignited fire "would not be considered unacceptable changes in forest cover or visual/scenic qualities." The latter assertion is not germane to the discussion of whether the action is the minimum necessary. By way of analog, the use of motor vehicles may not change forest cover or scenic qualities, but that does not mean they are therefore compatible with Wilderness.

Additionally, the notion that "natural" conditions that have long been absent within a particular area due to fire suppression and past development can somehow be reconstructed within that area with more natural fire suppression (to protect human property) is suspect. Add to that the rapidly changing nature of our forests from climate change, and it becomes nearly impossible to discern a historical "natural" baseline point from which we should gauge "naturalness." This is why Howard Zahniser's foresight is so important. As the author of the Wilderness Act, he focused, primarily, on the "untrammeled" character of wilderness in the Wilderness Act knowing that what is "natural" for that area will necessarily flow from what is "untrammeled." The uncontrolled, unmanipulated processes in wilderness create the state of naturalness for that area. This provides us with a baseline from which to measure our management actions outside of Wilderness. If we start managing Wilderness the same way we manage lands outside of wilderness, through active manipulation, we lose the untrammeled baseline and we thus lose what is "natural" for that area at that point in time.

The upshot is the interplay between the supposed purpose and need of this project, the Wilderness Act, and EIS is such that the concept of wilderness character is turned on its head. This misreading of the Act creates the illogical conclusions such as the perceived need to trammel areas to make them untrammeled.

We could not find the minimum requirements decision guide (MRDG) or minimum requirements analysis (MRA) in the DEIS or the on-line materials, though it is incorporated by reference. Why was the MRDG omitted?

NEPA

As noted in our scoping comments, the premise of this proposal is that fuel reduction through prescribed fire in and out of Wilderness and logging/thinning and other actions out of Wilderness will reduce or preclude a large wildfire. However, the analysis in the DEIS and associated materials overstate the number of fires that should have occurred in Wilderness, and emphasize

the most frequent number of fires in the agency's regime classes, rather than an average or the least frequent[2]. The analysis is also lacking in any meaningful discussion of fire history. Without that information, it is not possible to make a determination of if and when fires actually occurred.

The DEIS is insufficient since it does not address various, and at times conflicting, scientific studies about fire ecology. Rather, it seems to adopt a model from the ponderosa pine forests of the Southwest, which is not applicable here. When looking at complex variables such as climate change—past, present and future—even that model may not be a good fit, especially in dealing with Wilderness.

We provide some references, which address the following points:

1- Large wildfires are climate driven and fuel reductions have questionable results (see Attachments 1 and 2).

2- Research suggests most fires are not unhealthy (and most forests are not out of whack just because of fire suppression) as stand-replacing fires are normal in many forest types[3]. (See attachments 3 through 6).

3- Regardless, climate change is making irrelevant all previous assumptions. Even the Forest Service agrees that climate change will radically alter ecosystems, though the agency's apparent direction is manipulation, which conflicts with the Wilderness Act.
http://blogs.usda.gov/2016/11/01/looking-to-the-future-and-learning-from-the-past-in-our-national-forests/

Summary

Of the alternatives analyzed, alternative 1 would have the least damage to Wilderness. Alternative 4 is also designed not to trammel Wilderness, but the DEIS is not entirely clear on how manager-ignited fire would be prevented from entering the Wilderness and what impacts that may have on contiguous roadless and undeveloped areas.

Regardless, the DEIS inadequately addresses key fire ecology issues and research that shows structure protection is best done immediately adjacent to structures, not in the backcountry. The DEIS also fails to adequately address impacts to Wilderness and it twists the plain meaning of the Wilderness Act. Please keep us updated on this project.

[2] The regime classes themselves are controversial scientifically. Part of that controversy is based upon the fact that climate change is making the existing assumptions outdated.
[3] There is also a difference between pulse and press disturbances. Forests and watersheds have evolved with stand-replacing pulse disturbances, which provide watershed benefits.

Sincerely,

Gary Macfarlane
Board Member

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September 7, 2015

Ian Reid
District Ranger
North Fork John Day Ranger District
PO Box 158
Ukiah, OR 97880

Re: Ten Cent Community Wildfire Protection Project

Sent via email to: comments-pacificnorthwest-umatilla-johnday@fs.fed.us

Dear District Ranger Reid:

The following are comments from Wilderness Watch on the scoping letter for the Ten Cent Community Wildfire Protection Project. These comments focus on the proposal for the North Fork John Day Wilderness. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System.

We have three main concerns to the proposed project.

The Project Violates Wilderness

It should be noted that the purpose and need in the scoping letter itself does not address Wilderness at all. Further, the project would allow a level of manipulation and trammeling of the North Fork John Day Wilderness not permitted by the 1964 Wilderness Act. Our organization supports allowing lightning-caused fire to play their natural role in the North Fork John Day Wilderness. However, the proposed action proposes to significantly manipulate the Wilderness in ways that will destroy the wilderness character, in violation of the mandate of the 1964 Wilderness Act. Any supposed future wilderness benefits are speculative and equivocal.

The 1964 Wilderness Act governs the stewardship of the wilderness system. This visionary law defines Wilderness in part as "an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." Untrammeled means unmanipulated or unconfined, where humans do not dominate or impose human will on the landscape. Wilderness designation brings a special protection for Wildernesses and requires the federal land management agencies like the Forest Service to not manipulate or dominate the wilderness. Rather, the Forest Service is required to protect the area's wildness. This mandate is reflected in the epigram written by the drafter of the Wilderness

Act, Howard Zahniser of the Wilderness Society, who wrote, "*With regard to areas of wilderness, we should be guardians not gardeners.*"

This fundamental tenet of wilderness stewardship was reiterated in a program review initiated by the four federal agencies and conducted by the Pinchot Institute for Conservation in 2001. The purpose of the study was to examine the critical management issues facing Wilderness. One of the eight "fundamental principles" for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, "Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness….Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness."

Even if manager-ignited fire may bring some perceived ecological or species-specific benefits, human-ignited fire in Wilderness is a significant manipulation or trammeling of the area and can't, by definition, improve wilderness character. Prescribed fire can't begin to mimic natural fire in several key ways (extent, seasonality, severity, frequency, etc.). The Forest Service plan has the potential to turn the affected section of the North Fork John Day Wilderness from a wild wilderness into a heavily manipulated, managed forest. Allowing the area to evolve of its own accord and letting lightning-caused fire play its natural role in the Wilderness is a much better alternative.

Indeed, if the goal is to protect other values, then research shows that action around homes is the most effective. Further, there is considerable manipulation proposed outside the Wilderness. Why isn't that sufficient?

The scoping letter and associated maps seem to suggest there would be one very large fire for about 9,000 acres. Is that indeed accurate? The Wilderness part of the scoping letter is very brief and incomplete compared with the more detailed proposals for the logging and thinning outside of Wilderness.

The "Need" for the Project in Wilderness (or even out of it) is Not Well Supported

The scoping letter is based largely on the premise that fuel reduction through prescribed fire in and out of Wilderness and logging/thinning and other actions out of Wilderness will reduce or preclude a large wildfire. The allegation is made that such an action would allow fire to play its natural role in the future. There are serious problems with these assumptions. In the subheadings below, we address some scientific studies that refute these assumptions.

<u>Large wildfires are climate driven/fuel reductions have questionable results</u>

There is considerable research that supports the contention large fires are climatically driven and fuel reductions do not work. For example see Forest Service research on the Fourmile Fire in Colorado. That abstract notes, "Fuel treatments had previously been applied to several areas within the fire perimeter to modify fire behavior and/or burn severity if a wildfire was to occur. However, the fuel treatments had minimal impact in affecting how the fire burned or the damage

it caused." Other studies question the assumption that fuel treatments will be effective in reducing large wildfires.

Most fires are not unhealthy or out of the natural range

Significant recent research suggests that the effects of fire suppression have been overstated. In other words, the forests are not out of whack as the scoping letter suggests. This is especially true for all forests outside of the lowest elevation dry forest of ponderosa pine, and even may include ponderosa pine.

The Wildland Urban Interface

The best way to deal with protecting homes is through policies like installation of fire resistant roofing material and removal of flammable materials away from homes. Forest Service research suggests this is the most effective way to prevent loss of structures.

The agency needs to look at a variety of options including no action for the Wilderness. Further, if this project goes forth, the agency needs to have quantifiable objectives so it can demonstrate whether the project has been effective in achieving goals, including allowing fire to play its role in Wilderness.

Please keep Wilderness Watch informed of next steps in the environmental review process for the Ten Cent project.

Sincerely,

Gary Macfarlane