From: Keith Hammer
To: FS-appeals-northern-regional-office
Subject: [External Email]Objection to Bug Creek Project on Flathead NF
Date: Monday, April 26, 2021 2:26:47 PM
Attachments: SVC Bug Creek Objection 210426.pdf

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Dear Folks;

Please find attached our Objection to the Bug Creek Project on the Flathead NF.

Please acknowledge your receipt of this Objection by reply email.

Thank you,

Keith

Keith Hammer - Chair
Swan View Coalition
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http://www.youtube.com/user/swanviewcoalition

"Nature and human nature on the same path."

BEFORE THE OFFICE OF THE REGIONAL FORESTER
REGION ONE – USDA FOREST SERVICE
Objection Reviewing Officer

SWAN VIEW COALITION	)	
Objector)		
	)	**NOTICE OF OBJECTION**
v.	)	**PURSUANT TO**
	)	**36 CFR 218**
CHRISTOPHER DOWLING	)	
SWAN LAKE DISTRICT RANGER	)	
Responsible Official)		

DECISION OBJECTED TO:

Bug Creek Integrated Resource Management Project
Draft Decision Notice and Finding of No Significant Impact
(hereafter BCP, Project, DDN and FONSI)
Christopher Dowling, Swan Lake District Ranger, March 15, 2021.

Objector:

Keith J. Hammer
Chair
Swan View Coalition
3165 Foothill Road
Kalispell, MT 59901
406-755-1379
keith@swanview.org

April 26, 2021

Swan View Coalition (SVC) is a non-profit conservation organization dedicated to conserving water quality and quiet, secure habitats for fish, wildlife and people on the Flathead National Forest and greater Flathead River Basin. Our members use these areas, including the Project area, for recreation, employment, wildlife viewing, photography, research, education, aesthetic enjoyment, spiritual rejuvenation, and other activities.

On January 21, 2018, SVC submitted written comments on the Bug Creek Forest Health and Fuels Reduction Proposal (Attachment A). On February 6, SVC attended the

Proposal Open House and submitted follow-up comments on February 15, 2018 (Attachment B).

On December 14, 2020, SVC submitted comments on the initial Project EA and the request for comments on Exceeding Maximum Opening Size Limits (Attachment C), along with two DVDs of supporting documents. Our letter incorporated by reference the December 11, 2020 comments submitted by WildEarth Guardians Marla Fox (Attachment D). We did not attach that letter to our comments at that time because we could see it had already been submitted to the correct Forest Service email address in a timely manner (Attachment E).

On December 29, 2020, SVC submitted further comments on the Project EA and its lack of information regarding the illegal mountain bike trail network on Crane Mountain (Attachment F). On February 2, 2021, SVC submitted further comments on the request for comments on Exceeding Maximum Opening Size Limits (Attachment G), which attached a copy of Atchley et al 2021 (Attachment H).

The Response to Comments (RTC, at DDN Appendix B) fails to adequately address our concerns and fails to address the comments of WildEarth Guardians, whose timely comments we incorporated by reference. The RTC, DDN and revised EA fail to result in the substantive and procedural changes in the Project and analyses necessary to comply with laws, regulations and a reasonable code of ethics. We remain concerned that the BCP and DDN/FONSI will harm water quality, fish, wildlife, and our members' interests.

We ask that all the attachments to this Objection be read in their entirety as an integral part of this Objection as we will not repeat those concerns in full here. We submitted with our 12/14/20 comments two DVDs of supporting documents, numbered 1 and 2. Should we reference documents on those DVDs in this Objection, we will most often use the format DVD X, Folder XX, filename.

We incorporate by reference the Objections being filed by Friends of the Wild Swan and WildEarth Guardians.

Executive Summary

The BCP fails to adequately distinguish between and quantify the risks to grizzly bears and other wildlife by decommissioned, abandoned, temporary, open, gated, and barricaded roads, as well as non-motorized but admittedly high-use trails. As a result, it draws arbitrary and capricious conclusions to support the building and rebuilding of more roads, culvert crossings and trails in areas already suffering from too many roads, culverts and trails. Moreover, the BCP builds and rebuilds roads in order to support specious logging and other "vegetation management" that will not protect neighboring private lands and structures from fire, will instead make the fire risk situation worse, and builds or adopts trails without a firm plan to decommission unwanted trails or account for the impacts of the trails retained. On the whole, the BCP does not "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the 2018 Forest Plan (see the

10/31/17 Biological Assessment on the revised Forest Plan, at 127). This is a violation of the Administrative Procedures Act, the National Environmental Policy Act, the National Forest Management Act, the Endangered Species Act, and the Clean Water Act.

The DDN's Response to Comments

The DDN's Response to Comments (RTC) is largely argumentative and often misrepresents our comments in order to have a "straw man" to argue against. The RTC essentially restates the Forest Service's position and fails to provide us any substantive relief at all and only very little procedural relief. We therefore see little merit in responding to each RTC. We will take the more productive route here of summarizing some of our key concerns in hopes that, in conjunction with a reading of all our attachments, our concerns will be better understood:

1. The BCP does not "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the 2018 Forest Plan (see the 10/31/17 Biological Assessment on the revised Forest Plan, at 127). The biological premise of the Forest Plan and NCDE Conservation Strategy is that the 2011 "on-the-ground conditions" be maintained, not just the "on-the-books" baseline numbers. The RTC refuses to acknowledge this distinction while simultaneously making our case that maintaining the latter does not necessarily maintain the former, as promised.

a. "The 'on-the-ground conditions' you reference do not apply to cover . . ." (RTC at 81). "The project activities would decrease hiding cover by . . . 10% in the Crane Mountain subunit" (PF Exhibit L096a at 36).

b. Linear miles of total roads and open roads can be increased without increasing OMAD or TMAD (RTC at 66 and 82-83, PF Exhibit L096a at 39, 2020 EA at 145; see also DVD2, Folder 07, 2020-11-20 Doc. 97-1 Decl_Keith Hammer.pdf, Exhibit 2).

c. "The on-the-ground conditions you reference do not apply to non-motorized use . . ." (RTC at 87).

d. The Flathead has included and learned to exploit loopholes in its Forest Plan in order to build roads, open roads, build or adopt high-use trails, and remove cover, among other things - without it appearing to change "on-the-ground conditions" and while reportedly maintaining "on-the-books" baseline numbers. The Flathead may view this as a testament to cleverness, but it fails to "maintain the on-the-ground conditions that have contributed to the growth and expansion of the NCDE grizzly bear population."

2. The EA and the BA (PF Exhibit L096a) utilize "600' to cover" criteria, but do not explain why it is used or the science and impacts to grizzly bear it is based on. It does no good to tell us this criteria is not a Forest Plan standard when that is precisely why we asked for an explanation in the EA for why it is being used. (RTC at 81).

a. The RTC, at 80, says "The updated EA discusses hiding cover and forest openings and discloses which units would create the largest distances to cover (p135)." There is no such information on EA page 135.

b. The RTC, at 80, says "The updated EA clarified impacts to grizzly bear movement because of the openings created (p135)." There is no such information on EA page 135.

3. Gates, boulders and berms (the latter two are all that is required to render a road "impassable") continue to be less effective at stopping use than physical re-contouring and re-vegetation (which are not required to render a road "impassable"). Project File Exhibit L12 undercounts ineffective closures prior to 2005 because they weren't considered ineffective if they could be repaired on the spot, no matter how long they had been allowing motor vehicle trespass. It appears PF Exhibit L4 also undercounts ineffective closures by not counting broken gates as ineffective if the road behind the gate was overgrown with vegetation (pdf page 18).

a. It is morally and intellectually dishonest to argue that gates and berms are good enough, but then rely on re-vegetation of the road behind them to make their closure actually effective. (e.g. RTC at 66-67).

b. Some 28 miles of currently overgrown roads will be cleared for log hauling under the BCP (RTC at 66). Gating or blocking these roads afterward as "impassable" will not make these roads as secure for wildlife protection as they are now - as noted in the two paragraphs immediately above.

c. RTC page 64 says the EA was updated to include details of the previous Crane Mountain Salvage Project, but provides no page number for the updated EA! Using a word search of the pdf, the only such information we could find is on pages 197-199. It shows how a long list roads to be decommissioned under the Salvage Project would instead in largest part simply be closed with a barrier or gate under the BCP. Pages 197-199 don't indicate which of these roads are currently overgrown and would be cleared for log hauling, but it appears they are likely among the 28 miles of such roads discussed in the paragraph immediately above. If so, grizzly bear and other wildlife will not be nearly as secure as they are currently or were in 2011, let alone as secure as had the Salvage Project decommissioning been completed as promised. Clearly, the Flathead is more concerned about doing whatever it wants than following through on prior commitments.

4. The updated EA still has no alternative that would meet the 19/19/68 "research benchmarks" used in consultation with FWS to limit Incidental Take. The effects of such an alternative are not covered by the No Action alternative nor via Forest Plan consultation with FWS, as implied and claimed in the RTC at 62.

5. The updated EA still contains no Grizzly Bear Subunit map, no map of grizzly bear denning habitat, no map of road densities, and no map of grizzly bear Secure Core. The

public and decision maker must instead seek out PF Exhibit L-4, which once found is entirely inconsistent in labeling which maps are of Secure Core, OMRD and TMRD, among other things. The RTC, at 85, provides inadequate relief in simply pointing to PF Exhibit L-4. The updated EA remains inadequate in these regards.

6. The RTC, at 84-85, does not adequately address the question of timing and overlap of impacts from Bug Creek and Mid-Swan project activities. Perhaps at its most truthful, it simply states "dates of implementation of the MidSwan and Bug Creek projects are not known. The Bug Creek project analysis for grizzly bears acknowledges that motorized use on restricted roads may overlap for an unknown period of time due to motorized use of restricted roads in the Porcupine Woodward subunit." Simply acknowledging impacts may occur is not the "hard look" required by NEPA. The RTC references PF Exhibit L-004 but we find it of little help and it mentions Mid-Swan not at all.

7. The RTC attempts to relieve the EA and DN of the responsibility to adequately describe the past actions that resulted in an extensive unauthorized mountain bike trail network on Crane Mountain and to clearly identify who in the past has promoted these trails, along with an indication of whether those persons will or will not be allowed to Partner with the Forest Service on Crane Mountain or elsewhere.

a. As noted on page 8 of our 12/14/20 comments, Ron Cron was cited for constructing an unauthorized bike trail on Crane Mountain via a 2011 Probable Cause Statement. Nowhere does the RTC, DDN or EA mention that Ron Cron is being rewarded for his efforts via the revised Flathead Forest Plan and BCP: "[Flathead Forest Planner Joe] Krueger singled out Ron Cron, a Kalispell mechanic and mountain bike enthusiast as 'one of the big winners' who participated extensively in the planning process and offered constructive ideas. Cron has for years been trying to establish a mountain biking trail system at Crane Mountain. The new revision incorporates portions of his project." (3/5/15 Daily Inter Lake, Attachment I).

b. Nor do the RTC, DDN or EA mention that the Crane Mountain Trail System Expansion Project was first listed on the Flathead's Schedule of Proposed Actions in January 2010 (Attachment J) or that Ron Cron conducted public fund-raising events to allegedly help pay for the NEPA planning of the project. In spite of this history, the RTC at 122 states: "The Forest Service has not received any specific written proposals or requests to volunteer or use the Crane Mountain area." If this is true, where then do the EA and DN discuss the unwritten proposals and requests that concern Crane Mountain? They had enough import to put the Trail System Expansion Project on the SOPA and receive praise from Forest Planning staff!

c. It is worth noting that the 2015 article in Attachment I also states "Krueger said a private company has already agreed to bankroll a 'hut-to-hut' system of backcountry shelters near Tally Lake." The Flathead has established a really bad habit of failing to disclose its private Partners, as in the above 2015 news article and as reported recently in three news articles when the Spotted Bear District Ranger refused to name who was willing to fund his proposal to build 4 rental cabins at Bunker Park. See:
https://missoulian.com/news/local/cabin-plan-attracts-donations-damnation/article_46453159-2bf6-55be-a48f-c87dbbeecb22.html

https://dailyinterlake.com/news/2021/mar/14/officials-propose-adding-four-rental-cabins-remote/
https://hungryhorsenews.com/news/2021/mar/17/proposed-bunker-park-cabins-draw-immediate-fire/
This behavior is unacceptable in a public agency and needs to be corrected in the BCP by disclosing the private parties that have expressed interest in the proposed trail system expansion.

d. The RTC, at 122, attempts to dismiss the behaviors that led to an entire unauthorized mountain bike trail network on Crane Mountain, then has the audacity to claim that our reporting that one of those same persons was caught in December 2020 clearing a trail without authorization in Krause Basin is "outside the scope of this [Bug Creek] project." The moral of the story here is that, if certain people or groups did not learn their lesson on Crane Mountain and are conducting similar unauthorized trail clearing in Krause Basin, those people should not be rewarded with nor trusted with a Forest Service Partnership. If the Flathead would like to dismiss all the speculation about these Partnerships, it needs to clearly name who they are and quit being coy about it.

8. The EA and DDN fail to include a substantive measurement of the effects of the non-motorized trail system, nor an adequate program for eliminating human use of the trails not to be retained.

a. "The on-the-ground conditions you reference do not apply to non-motorized use . . ." (RTC at 87). Hence, the effects of the non-motorized trail system are not captured in the calculations of OMAD, TMAD and Secure Core.

b. It does no good for the RTC to list pages in the EA where the impacts of non-motorized trails are addressed (RTC at 122) and then turn around and downplay the effects of non-motorized recreation on wildlife found in research papers (RTC at 85-86). This instills little faith that the agency is reporting impacts in an unbiased manner.

c. The "naturalization" techniques outlined in the EA (at 27) and in the USDA Trail Notebook (PF Exhibit H002) are appreciated, but will likely be highly ineffective without intense law enforcement, a change in subcultures that enjoy clearing trails without authorization, and a change in Forest Service culture that repeatedly rewards unauthorized trail building. The DDN and EA include no adequate plan or timeline for the application of these naturalization measures, let alone a clear identification of where unauthorized trails exist and which unauthorized trails will have what types of naturalization applied to them.

9. The EA and cited Project File documents do not contain an adequate assessment of the cumulative effects of roads and trails being built, rebuilt and adopted on the Flathead. The RTC relies on the Forest Plan and consultation with FWS for this assessment of cumulative effects (at 82 and 88) while simultaneously saying that our arguments about the adequacy of the Forest Plan are "outside the scope of this project" (at 126). The agency can't have it both ways. If it wants to rely on the Forest Plan to supplement the BCP analyses, then the adequacy of the Forest Plan and its standards are absolutely within the scope of the BCP and this Objection.

10. The EA still does not contain adequate information from which the public can easily glean which logging units form openings in excess of Forest Plan standards of 40, 80, 90, and 150 acre maximums. Our 12/14/20 letter explained how the November 2020 EA failed to provide the necessary information. It does no good for the RTC (at 131) to parrot back to us the very same pages in the 2020 EA and insist that they did, especially when the agency itself found it necessary to gather the necessary information together, post it to its web site, and restart the 60-day public comment period on openings that exceed maximum opening sizes! (See RTC at 111).

a. It is an insult for the RTC to claim "the commenter is confused between the 30-day public comment period for the Draft Environmental Assessment and the 60-day public notice period for exceeding maximum opening sizes . . . These are two separate requests of the public and are not tied together" (RTC at 131). We weren't confused, it is simply our contention that the two comment periods are tied together because the details of those opening sizes must be in the EA along with an adequate assessment of the effects of those excessive opening sizes. After all, the excessive opening sizes would not even be at issue if not for the BCP that would create them. (And, by the way, the initial request for 60-day public comment on excessive opening size was issued in the same 11/13/20 letter requesting 30-day public comment on the BCP EA, which tied them together at the outset).

b. In at least two places on page 111, the RTC claims clarification has been added to the updated EA on the issue of excessive opening size and their effects, but then fails to mention where in the updated EA it can be found. That is neither responsive nor helpful.

11. The EA, DDN and RTC fail to adequately address science finding that the proposed logging and vegetation treatments will likely make the fire risk situation worse instead of better. We included in our comments discussion of, and in many cases provided, research papers demonstrating that the effects of the BCP are highly controversial and uncertain, which mandates the preparation of an EIS (see the Ninth Circuit opinion in *Bark v. USFS*, Attachment K). Moreover, we summarize here the expert findings of Dr. Joseph Werne, extracted from his 4/4/21 Declaration regarding the inadequacy of current fire models and fuels management prescriptions (Attachment L):

a. When ladder fuels are removed (by thinning), ground-level wind speed and turbulent mixing both increase, leading to faster fire spread and greater oxygen-transport efficiency; this, in turn, results in increased fire intensity.

b. In many cases this aerodynamic effect is more important than the fire-dampening effects of the fuels reduction being evaluated.

c. Two recent studies demonstrate just how consequential neglecting canopy wind-drag effects can be, leading to potentially disastrous results if aggressive ladder-fuel removal is applied. See Atchley et al. 2021, and Banerjee et al. 2020 (attached to declaration).

d. Both papers demonstrate that the removal of ladder fuels reduces the sub-canopy wind drag, ultimately leading to increased fire spread.

e. In other words, they both show how fuels-reduction treatments can increase fire spread, which is the opposite of what currently-used operational model studies predict.

f. Furthermore, the Banerjee et al. 2020 paper goes further and also shows that aggressive ladder fuel removal increases the likelihood of overstory crown fires compared to more modest ladder fuel reductions, which is again opposite to operational model-run predictions.

g. Other recent studies also confirm these findings. Coen et al. 2018 (attached to declaration) demonstrate that drought and fuel load were secondary effects compared to fire-induced atmospheric motions, which operational fire-behavior models neglect.

h. Bradley et al. (2016) (attached to declaration) analyzed satellite data for 1500 fires from 1984 to 2014, affecting 23.5 million acres of forestland. Their results show that the more heavily forestland is managed, the more severely it burns, and the least-managed land (i.e., our National Parks and Wilderness Areas) are the most firesafe.

i. By omitting atmospheric dynamics and wind-drag effects associated with vegetation treatments, fuels reductions designed to reduce fire intensity and fire spread are undoubtedly producing the opposite effect.

12. The RTC, DDN and EA only vaguely mention Special Use Permits (SUPs) and say virtually nothing about their effects or their cumulative effects with the BCP. These omissions are unacceptable given the Flathead NF knows full well what sorts of SUPs are likely to be issued in and near the project area.

a. Attachment M is a pdf of the Flathead's current web page for 19 proposed Summer 2021 SUPs.

b. Attachment N is the Crane-Sixmile Map for the Snowbike Nation SUP, which shows motorized bike and motorcycle tours for Roads 9714 and 498. Presumably, the section of Road 9714 to be reopened to motorized use in order to reconnect these two roads under the BCP will be included in future SUPs. The map also shows motorized tours for Forest Service trails in the Sixmile area in the adjacent grizzly bear management subunit.

c. Attachment O is the Adventure Cycling Association SUP map for its bike tours in the Swan Valley, including use of Roads 9714 and 9745 on Crane Mountain.

d. Attachment P is Bike Adventures SUP map for its bike tours in the Swan Valley, including use of Roads 9714 and 9745 on Crane Mountain.

e. The RTC, DDN and EA make absolutely no mention of these specific SUPs, let alone their effects or cumulative effects. It is arbitrary and capricious to omit an assessment of these SUPs and their cumulative effects, given that they will most certainly result in increased impacts to the tour route areas and increased promotion of those routes to the general public. The SUPs are proposed to be approved with a Categorical Exclusion,

meaning there will be no adequate EA or EIS prepared there. The piecemeal evasion of assessing these effects and cumulative effects affecting the same geographic area can only be rectified by the preparation of an adequate EIS.

13. And, finally, the RTC at 80 tells us "Comments from WildEarth Guardians were not received on the Bug Creek project. It is not clear which comments are referenced here for the discussion of impacts of openings on lynx." Wouldn't it have been more productive to email us about this when the problem was first discovered, rather than letting the problem languish for months? As mentioned at the outset of this letter, we received the WildEarth Guardians' comment letter the same day as it was sent via email to the correct Forest Service address, incorporated it by reference and saw no need to include a copy of it along with ours at that time. (See Attachments D and E).

Conclusion

We remain concerned that the BCP will harm fish, wildlife, forests, and the ability of people to live and recreate safely within and near National Forest lands. We remain concerned that this harm will be amplified by other projects and SUPs being planned and implemented under the 2018 Forest Plan without an adequate assessment of their cumulative effects.

For the reasons given above and in the referenced documents, the DDN and its reliance on the EA is arbitrary, capricious, an abuse of agency discretion, and not in accordance with law - including the APA, NEPA, NFMA, ESA, and CWA.

Relief Sought

1. Declare the BCP EA and DDN inadequate and withdraw them.

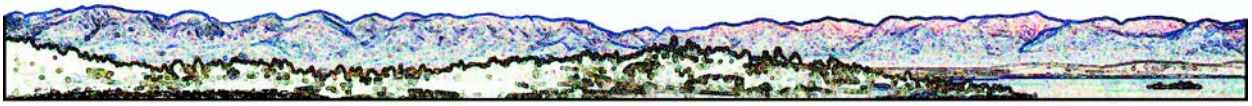
2. Prepare an EIS that adequately assesses the cumulative effects of the BCP and other past, current and reasonably foreseeable projects.

3. Insure that the EIS includes an adequate range of alternatives, including an alternative that would meet the 19/19/68 research benchmarks as defined by Amendment 19 in all grizzly bear management subunits and one that would finish implementing the road closure and decommissioning actions promised in the prior Crane Mountain Salvage Project.

4. Deny all applications for Special Use Permits in the BCP project area and adjacent grizzly bear management subunits until their effects and cumulative effects have been adequately assessed in an EIS.

ATTACHMENT A

Swan View Coalition *Nature and Human Nature on the Same Path*



3165 Foothill Road, Kalispell, MT 59901 swanview.org & swanrange.org ph/fax 406-755-1379

January 21, 2018

Kendall Cikanek - Acting District Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

Re: Comments on Bug Creek Project Scoping Notice
Submitted as PDF to comments-northern-flathead-swan-lake@fs.fed.us

Dear Mr. Cikanek;

Please accept these initial scoping comments on the Bug Creek Forest Health and Fuels Reduction Project Proposal dated 1/12/18. They are submitted on behalf of Swan View Coalition, Friends of the Wild Swan, WildEarth Guardians, and Brian Peck.

We appreciate this opportunity to see how the Flathead National Forest intends to conduct projects and analyses under the revised Forest Plan once it has a final Record of Decision. At least that's what we assume is going on here because the initial analyses and Proposal you present fail to comply with the current Forest Plan, as per Table 1.

Table 1: Crane Mountain Grizzly Bear Subunit Motorized Route Density and Security Parameters

	OMRD	TMRD	Security Core
Amendment 19 Objectives	≤19%	≤19%	≥68%
Current A19 Conditions	28%	53%	25%
Bug Creek Proposal, p. 4	"Secure habitat for grizzly bears . . . is abundant."		

Apparently, the new way of doing analyses has abandoned scientific integrity altogether. As brief as it is, your Scoping Proposal reveals how the new analyses is designed to wholly discount the impacts of road and trails, both motorized and non-motorized, on grizzly bears, as follows.

On page 4, the Proposal states: "Secure habitat for grizzly bears and elk during hunting season is abundant." How can this be, when Fish and Wildlife Service's 11/22/17 Biological Opinion on the revised Forest Plan lists the current Amendment 19 habitat security parameters for the Crane Mountain Subunit as 28/53/25 for OMRD/TMRD/Secure Core, respectively (page III-62)?

FWS's BO, on page III-87, continues to use the 19/19/68 parameters as OMRD and TMRD maximums and Core minimum above and below which Incidental Take of female grizzly bears is anticipated, based on these "research benchmarks." In other words your scoping analyses somehow conclude that abhorrently substandard OMRD, TMRD and Core deserve to be called "abundant" grizzly bear security!

Apparently, what you are trying to do is simply declare that whatever the 2011 or current habitat security happens to be, it is now hereby declared "abundant" because the revised Forest Plan has changed up how it defines and calculates OMRD, TMRD and Core. Your findings are arbitrary, capricious, an abuse of agency discretion, an ignorance of the best available science, and not in accordance with law.

Nor do your analyses comply with the best available science and promises made in the draft NCDE Grizzly Bear Conservation Strategy to retain the grizzly bear habitat security conditions that existed in 2011 - both of which are promised in the revised Forest Plan. The Proposal gets it wrong right from the get-go, in describing the existing habitat security for grizzly bears and elk.

With this blasphemy at the outset, you then proceed to renege on prior road decommissioning decisions and instead propose to build/authorize up to 15 miles of mountain bike trails (some already illegally built) and build 17 miles of permanent road in this already over-roaded area (with some of that road construction apparently on previously decommissioned road templates that you would bring back into the road "system"). The bike trails would appear to reside in the revised Plan's Crane Mountain MA-7 Focused Recreation Area. (See the Proposed Action Transportation Map).

We object in the strongest of terms to the notion that mountain bike trails and stored "ISS" roads that may still function as trails (yet be omitted from calculations of TMRD) can exist in unlimited numbers without displacing and having a negative impact on grizzly bears. This is the type of non-analyses laid out in the Forest Plan and FEIS that we are currently objecting to for reasons largely described in our comments on the draft Conservation Strategy and draft Habitat Based Recovery Criteria, as well as in our Roads to Ruin/TMRD report and our Supplement to that report. Please find those documents at the following links and consider them a full part of this comment letter:
http://www.swanview.org/reports/SVC_on_NCDE_CS_130730.pdf
http://www.swanview.org/reports/SVC_HBRC_Oral_160707.pdf
http://www.swanview.org/reports/SVC_et_al_HBRC_Comments_180103.pdf
http://www.swanview.org/reports/Roads_to_Ruin.pdf
http://www.swanview.org/reports/Supplement_to_Roads_to_Ruin_171205.pdf

We do appreciate your mention that the 1996 Crane Mountain Salvage decision called for the decommissioning of 84 miles of road, and that 60 miles of that work remains left undone. The Flathead's 3/23/15 Road Decommissioning spreadsheet, however, lists 107 miles of decommissioning under that decision, with 72 miles left undone. See:
http://www.swanview.org/reports/150323_FNF_Decomm_Spreadsheet.pdf

More importantly, however, we appreciate that you rightly refer to these road treatments as "decommissioning" even though the 6/18/96 Crane Mountain Salvage Decision Notice and the 1996 Crane Mountain Supplement Appendix E refer to it as

"reclamation." As you'll find in the A19 administrative record and our Roads to Ruin/TMRD and Supplemental reports linked above, the A19 Amended EA and the Road Decommissioning Spreadsheets treated the two terms as synonymous from the very beginning of A19. We're glad that you do also.

What we don't appreciate, however, is "This project proposes to add the roads back on to the road system from decommissioning in the Crane Mountain salvage decision" (Proposal page 5). Your Proposal not only abandons the decommissioning already decided in 1996, it replaces it with the construction of new roads, the reconstruction of previously decommissioned roads and with the trading in of permanent road barriers for gates to facilitate logging, forest management and potential firefighting. Page 5, for example, states: "Two barriers will be replaced with gates on NFSR's 9713 and 9714 to maintain drive through access for wildland fire suppression and forest management access within the project area."

Replacing permanent barriers with gates and building roads to be put into storage (ISS), where they can continue to be used as trails and easily violated by motor vehicles, does not maintain the grizzly bear habitat security conditions of 2011, let alone accomplish the level of habitat security promised in 1996 (even though the 1996 decision itself would fall short of 19/19/68 standards/research benchmarks).

Storing a road as ISS, when it is not needed "within the next 10 to 20 years" (Proposal page 5), does not provide the wildlife security intended by reclaiming and decommissioning roads under A19. ISS allows the road to be blocked to motor vehicles for a mere 50 feet and to remain barren of vegetation where it continues to get human use by becoming one more favorite bike path, foot path or ATV trespass. A19 requires that the road be revegetated and no longer function as a road or trail, motorized or non-motorized.

Moreover, "ISS roads would not be returned to the productive land base" (Proposal page 6) which, if they did, would include the growing of trees and brush that limit human use and secures wildlife habitat from such intrusions. Decommissioning does return roads to the productive land base, per NFMA requirements. The 2011 grizzly bear habitat security conditions will not be retained under this Project.

Lastly, we do appreciate the Proposal's finding, on page 4: "For numerous wildlife species, reducing closed road densities can decrease displacement and mortality risk." This statement is consistent with A19 and the best available science (provided it is not done by opening closed roads). Storing closed roads as ISS, however, does not reduce closed road densities. That requires that roads be decommissioned and removed from the road "system."

Sincerely,

Keith J. Hammer
Chair

Also signing for:

Arlene Montgomery
Program Director
Friends of the Wild Swan
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Marla Fox
Rewilding Attorney
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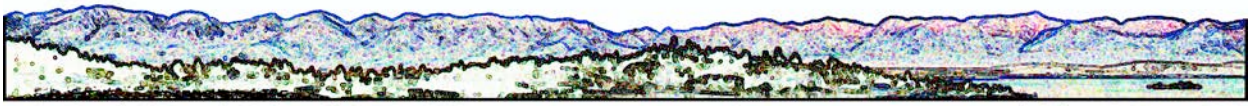
ATTACHMENT B

Swan View Coalition *Nature and Human Nature on the Same Path*



3165 Foothill Road, Kalispell, MT 59901 swanview.org & swanrange.org ph/fax 406-755-1379

February 15, 2018

Kendall Cikanek - Acting District Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

Re: Further Comments on Bug Creek Project Scoping Notice
Submitted as PDF to comments-northern-flathead-swan-lake@fs.fed.us

Dear Mr. Cikanek;

Please accept these additional scoping comments on the Bug Creek Forest Health and Fuels Reduction Project Proposal dated 1/12/18.

I attended the open house on February 6. I was very disappointed in the level of understanding members of your project planning staff have of what is required under the current Amendment 19 and what is and is not required under the revised Flathead Forest Plan. I told them I would submit another comment letter (none had apparently read our January 21 comment letter) and provide access to a copy of our Objection to the revised Flathead Forest Plan.

Joleen Dunham said she understands the revised Forest Plan to require that all stream-aligned culverts be removed from roads that are stored and will not be counted in Total Motorized Route Density (TMRD). This is not correct and I told her so. See the revised Forest Plan Glossary definition of "impassable" road on page 29:

> A road that has been treated in such a manner that the road is blocked and there is little resource risk if road maintenance is not performed on a regular basis (self-maintaining) . . .

This allows whatever stream-aligned culverts the Flathead considers to be low-risk to remain in place. The Flathead has been leaving such culverts in place since about 2011, in violation of A19, including in such critical bull trout watersheds as Coal Creek and in spite of the fact some of those culverts have risk issues. It removed a number of these roads from TMRD, contrary to findings by FS and FWS wildlife biologists that such "storm-proofing" of roads would not lower TMRD.

Now the Flathead has had to add those roads back into TMRD (see the Flathead's 2016 A19 report to FWS issued January 2018). However, it doesn't intend to include

stored/storm-proofed/ISS roads in TMRD in the future under the revised Forest Plan because it has redefined what "impassable" is and how TMRD is calculated.

These matters are summarized in the first 12 pages of our 2/9/18 Objection to the revised Plan: http://www.swanview.org/reports/SVC_Forest_Plan_Objection.pdf

These matters are discussed in greater detail in my Roads to Ruin report, TMRD report and the Supplements issued to them. A description of and links to these reports and supplements are located at:
http://www.swanview.org/articles/whats-new/supplement_issued_to_roads_to_ruin_report/248

We can understand that your project planning staff might get confused about these matters because the Flathead can't seem to get its story straight. The Flathead has two categories of impassable roads: those that ARE and those that ARE NOT included in TMRD. See: http://www.swanview.org/reports/SVC_Supplemental_Objection.pdf

We ask that your project planning staff read the information we have provided links to above. This is necessary to better understands the science behind A19 and what A19 actually required, as opposed to the alternative universe the Flathead NF has described since 2011 as though that is somehow A19.

I talked with Laura Strong (Holmquist) and she disagrees that A19's TMRD includes all roads on the "system," and that it includes only those not blocked to motorized use. We ask that she also read the documents we reference above. They explain how the South Fork Grizzly Bear Study (Mace and Manley 1993) specifically answered questions raised in the Flathead's 1990 Open Road Density DEIS: a) what size area should be used to compute average ORD and b) can limited vehicle use occur on a road and still accomplish the objectives of protecting wildlife habitat?

The answers were to use the "moving window" method of calculating precise road densities and that, "unless a road has completely revegetated, managers should assume that some level of human use is occurring along closed roads, and grizzly bears will respond to that use" through displacement. The ORD DEIS was replaced with A19 and attention was extended to include TRD, which requires that a road be reclaimed and decommissioned, removed from the road "system," have all stream-aligned culverts removed, and be revegetated so it no longer functions as a road or trail, motorized or non-motorized. Total Road Density evolved into Total Motorized Route Density in order to capture the impacts of motorized trails, not to dismiss the displacement of bears from roads and trails by non-motorized human activity.

These matters are important and shed light on how totally arbitrary it is for Ms. Strong to conclude there is currently "abundant" security for grizzly bear and elk when the Crane Mountain subunit is so abhorrently below A19 19/19/68 standards that remain "research benchmarks" and taking thresholds in FWS biological opinions (see our 1/21/18 letter). These matters are also important as you define the "no action" alternative for your Bug Creek project, as I tried to outline verbally with Matt Shaffer at the open house:

What will your no action alternative be: a) will it be the current condition of the Crane Mountain subunit, where the Flathead has broken its A19 promise and failed to implement the remaining scores of miles of road decommissioning also promised in the 1996 Crane Mountain Salvage decision, b) will it be the Crane Mountain subunit with continued implementation of A19 until it finishes implementing the Salvage decommissioning decision, c) will it be the Crane Mountain subunit with full implementation of A19 until it meets all 19/19/68 criteria, or d) will it include no consideration of A19 and past promises/decisions because the revised Forest Plan has abandoned them?

We find that NEPA requires you to conduct a full analysis of each of these alternatives in an EIS. These alternatives and your new proposal also are connected actions needing full analysis in terms of cumulative effects and lost opportunities. A new Forest Plan does not relieve you of the responsibility to conduct analyses in accord with the A19 19/19/68 "research benchmarks" and taking thresholds employed in FWS's biological opinion on the revised Forest Plan.

In closing, we must note that it is in bad form for your planning staff to simply ask us "what do you think of our proposal" at the open house without firstly acknowledging they had received and read our 1/21/18 letter submitted two weeks in advance of the open house. We are taking the extra step with this letter to help insure that next time we speak with members of your planning staff, perhaps they will understand the background of our concerns with the project they are planning.

This will only happen, however, if they actually read the letters we submit and the background documents we have provided links to in this letter. We ask and hope that they do.

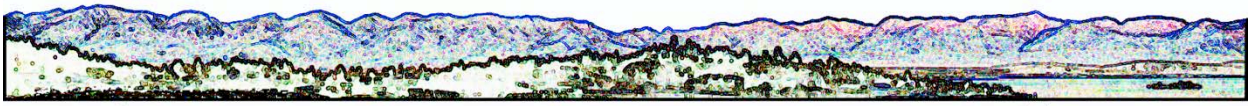
Sincerely,

Keith

Keith J. Hammer
Chair

ATTACHMENT C

Swan View Coalition *Nature and Human Nature on the Same Path*



3165 Foothill Road, Kalispell, MT 59901 swanview.org & swanrange.org ph/fax 406-755-1379

December 14, 2020

Chris Dowling - District Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

Re: Comments on Bug Creek Project EA
Submitted as PDF to comments-northern-flathead-swan-lake@fs.fed.us

Dear Mr. Dowling;

Please accept these comments on the Bug Creek Project EA. We incorporate by reference our Bug Creek scoping comments dated 1/21/18 and 2/15/18 and we ask that they be read in their entirety as a part of these comments. We also incorporate by reference the comments being submitted in this matter by Friends of the Wild Swan and WildEarth Guardians.

We also submit with these comments two DVDs of supporting documents, numbered 1 and 2. When we reference documents on the DVDs, we will most often use the format DVD X, Folder XX, filename. The documents cited in our 1/21/18 letter can be found on DVD 1, Folders 22, 22, 22, 04, 04, and 01 (per the order in which they are cited). The documents cited in our 2/15/18 letter can be found in DVD 1, Folders 01, 00, 04, and 00 (per the order in which they are cited).

1. Excessive Opening Size of Regeneration Logging Units

NOTE: The late-night (8:17 pm Friday, 12/11/20) notice in this regard changes nothing regarding the adequacy of the EA and what we have written below. That latter notice was not issued as a supplement to the EA and did not reset the 30-day public comment period for the EA. That notice does not explain why it was made necessary, nor whether it replaces the 11/13/20 notice issued in the EA cover letter, leaving the public to wonder why there are now two public notice periods for oversize logging units. Moreover, that latter notice was likely not received by many members of the public (those that still appreciate the sanctity of their weekends) until Monday morning, 12/14/20, the day that public comments on the EA are due and likely after many people had already submitted their EA comments. The issue of oversize logging units is inextricably tied to the EA and the issue of whether it adequately discloses the impacts of those units and the necessity for their excessive size. We argue the EA does not and we provide excessive distances to hiding cover for grizzly bear as one example of harm

caused by the excessive size. WildEarth Guardians' comments, at 19, discuss the impacts of oversize openings on threatened lynx. The Forest Service should be ashamed of giving the public the royal run-around on this!

The EA and its cover letter fail to provide adequate public notice and detail regarding regeneration logging units in excess of 40 acres. Adequate detail must be provided the public in the EA and then an adequate public notice must be issued.

The 11/13/20 EA cover letter states:

> This letter also serves to notify and invite a 60-day public review on regeneration harvest openings that would exceed maximum opening size limits established by the Flathead National Forest Land Management Plan. In addition to the 60-day public review, exceedance of the established size limits requires Regional Forester's re-view and approval. Proposed openings are primarily within the WUI and are needed to reduce fuels within the WUI, creating conditions resilient to disturbance, and treat insect and disease issues.

The EA alludes to openings exceeding Forest Plan standards on:

Page 16: "Four openings would be created through regeneration harvest which would exceed the maximum opening size in the forest plan. Regional forester approval would be required for creation of these openings; this approval would be obtained prior to the decision for this project. [Alternative B]"

Page 25: "Three openings would be created through regeneration harvest which would exceed the maximum opening size in the forest plan. Regional forester approval would be required for creation of these openings; this approval would be obtained prior to the decision for this project. [Alternative C]"

Page 112: "Alternative B would create four openings through even-age regeneration harvest that would exceed the maximum opening size in the forest plan."

Page 115: "Alternative C would create three openings through even-age regeneration harvest that would exceed the maximum opening size in the forest plan."

Page 224: "Under 2018 Forest Plan, max opening sizes are variable (up to 150 acres) and linked to potential vegetation type, which are discussed in Table 21 of the Forest Plan on page 75 (USDA 2018b). Therefore, the Bug Creek Draft comment period will be announcing another 60-day public notice for up to four areas exceeding maximum opening size, which includes the addition of proposed activities described under Alternative C, developed from public scoping comments. "

(Note that the above paragraph promises that the public notice on opening size would be issued simultaneously with the "Bug Creek Draft comment period," not at the end of it).

The Forest Plan (page 74) clearly states "The maximum opening size created by clearcutting, seedtree cutting, shelterwood seed cutting, or other cuts designed to

regenerate an even-aged stand of timber in a single harvest operation shall be 40 acres . . . Exceptions to the 40-acre maximum opening size standard may occur when determined necessary to help achieve desired ecological conditions for the plan area." (Emphasis added).

Yet nowhere in the EA does it disclose what units will create openings that exceed the 40-acre limit set by the Forest Planning Rule at 36 CFR 219.11(d)(4) and/or the Forest Plan's variable acreage standard (FW-STD-TIMB-07) provided under 36 CFR 219.11(d)(4)(i). This variable Forest Plan standard provides maximum opening size of 80 acres on warm-dry and warm moist, 150 acres on cool-moist and 90 acres on cold potential vegetation types.

The public can glean from EA pages 201-2010 that 7 seedtree units and 1 clearcut unit exceed 40 acres on their own (units 21, 26, 37, 49, 51, 97, 115, and 117), but cannot glean what combinations of which units will create openings that exceed 40 acres. Then the EA throws the public a curve ball by alluding to only 3 or 4 "openings" being of excessive size, as described above - and by claiming public notice and Regional Forester approval need be undertaken for only 3 or 4 openings. 36 CFR 219.11(d)(4)(ii) requires that public notice and Regional Forester approval is required for units exceeding the 40-acre Planning Rule maximum and the variable-acre Forest Plan maximums "established in paragraphs (d)(4) and (d)(4)(i)." (Emphasis added).

Moreover, it is impossible to determine from the EA which of the units or combination of units that exceed the 40-acre maximum also exceed which of the three maximums set in FW-STD-TIMB-07, depending on the undisclosed vegetation type. And one must pause here to note that we are at this point discussing a project that is deviating from a "nondiscretionary" Forest Plan standard which itself deviates from the 40-acre Planning Rule maximum - so we are dealing here with exceptions to the exceptions. How absurd!

The EA does not give a site-specific rationale for why this project's logging regeneration units cannot comply with the 40 acre maximum, let alone why it requires a deviation from the Forest Plan's larger size exceptions. Lastly, the EA does not include the subsequent detail provided in the late-night 12/11/20 notice. For the foregoing reasons, the public notices on excessive opening size are inadequate and must be reissued in the company of clear, concise information in the EA for all units that in combination create regeneration openings exceeding 40 acres.

Moreover, each violation of the Forest Plan's 40, 80, 90, and 150-acre opening size "standards" requires an amendment to the Forest Plan. Otherwise, those units are inconsistent with the Forest Plan and violate the NFMA.

These oversize openings are inextricably tied to increased impacts to grizzly bears, for example. Units 37, 38, 115, and 117 are exceptions to/exceed the "600' to cover maximum" rule intended to "provide cover and connectivity" for wildlife including grizzly bear (EA at 38 and 141). The EA, at 38, points to Forest Plan guideline FW-GDL-TE&V-02 as though the 600' rule is at least a guideline that "should" be followed - but the Forest Plan makes absolutely no mention of the 600' rule anywhere, not even in the referenced guideline.

The EA fails to mention that, under the 1986 Forest Plan (at II-31) "No point within the unit can be more than 600 feet from cover" in grizzly bear habitat. This was a non-discretionary prohibition even though listed under "guidelines." The EA provides no adequate rationale for the 600' rule, let alone the scientific basis for it, its use in the prior Forest Plan, and the environmental consequences of exceeding the rule. Nor does the EA provide adequate, unit-specific reasons for why each unit that either exceeds the 600' rule or contributes to openings that exceed the 40, 80, 90, and 150-acre opening size "standards" must be that size and shape and cannot be reconfigured to comply with those rules and standards.

We oppose all units that contribute to openings that exceed these rules and standards due to their increased negative impacts to grizzly bears and other forest resources, as well as the lack of adequate public notice required by law and regulation. This long list of exceptions to the exceptions to the mandatory "standards" also makes a laughing stock of the 2018 Forest Plan and renders it meaningless as a tool for limiting the impacts of road building and logging.

As will be discussed below, these excessively-sized units and openings do not "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the 2018 Forest Plan. They instead fragment the habitat in ways not allowed under the prior Forest Plan, which was credited with contributing to improvements in the bear population.

2. Grizzly Bear and Road Management

The EA makes no mention anywhere of the 1996 Crane Mountain Salvage decision to decommission over 80 miles of road in the project area, let alone that 60 miles of those roads have yet to be decommissioned (see the Bug Creek Scoping Document). Nor does the EA mention that Amendment 19's 19/19/68 limits on OMAD, TMAD and Core, (which prompted the road decommissioning in the Crane Mountain Salvage decision) remain the "research benchmarks" by which Fish and Wildlife Service will determine levels of incidental take (IT) of grizzly bear in Bug Creek and other projects. (See FWS's 11/22/17 biological opinion on the 2018 Flathead Forest Plan). These omissions are not remedied by Appendix E to the EA.

The public is left wondering if the Crane Mountain Salvage decision will some day be implemented and whether that promised road decommissioning is a part of the Bug Creek No Action alternative. We asked in our scoping letters that this No Action issue be clarified but the EA instead is absolutely silent on the issue.

EA page 137 notes the current Crane Mountain Subunit parameters are 28/55/25, but the EA fails to note those conditions are far in excess of the <19/<19/>68 IT benchmarks. Nor does the EA explain that those subpar baseline numbers are a primary reason there will be formal consultation with FWS over the Bug Creek project. Instead, the EA relies on inadequate Forest Plan standards to suggest the area is in plenty good shape for bears. The EA fails to develop and describe an alternative that would minimize the IT of bears by meeting the 19/19/68 research/IT benchmarks. Without such an alternative, the public and decision maker cannot make a reasoned comparison

of other alternatives to the research benchmarks and are left with no idea of what meeting 19/19/68 and minimizing IT looks like on the landscape.

The Bug Creek Project does not "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the 2018 Forest Plan (see the 10/31/17 Biological Assessment on the revised Forest Plan, at 127). Opening 3.4 miles of Road 9714 to form a motorized loop route, even if 1.6 miles of the Estes Lake Road/Trail is closed to motor vehicles, still results in a "net gain of 1.8 miles of motorized access" (EA at 88). This does not maintain the on-the-ground conditions that have contributed to the growth and expansion of the NCDE grizzly bear population.

In fact, the closure of that portion of Road 9714 was made by previous wildlife biologists to intentionally divide the road system on Crane Mountain to eliminate loop- levels of motorized traffic in order to benefit bears and their recovery. Current wildlife biologists are being intellectually and scientifically dishonest in claiming that reopening that section of road will not have appreciable impacts to bears.

The fact that this "net gain of 1.8 miles of motorized access . . . would not increase OMRD in the Crane Mountain subunit" (EA at 145) points to the inadequacy of the Forest Plan standards to actually measure on-the-ground conditions. It also points up the willingness of the Forest Service to exploit such loopholes by arguing that there are a lot of roads in the area already, so why worry (EA at 145). The Flathead's Joe Krueger explains how the Flathead sees no problem in building more roads in areas of already high total road density because it can do so without it showing up in TMAD numbers either (see DVD 2, Folder 07, 2020-11-20 Doc. 97-1 Decl _ Keith Hammer.pdf, Exhibit 2). This is what is happening in the Bug Creek Project for both OMAD and TMAD.

Building and opening more roads in areas of high road density does not maintain the on-the-ground conditions that have contributed to the growth and expansion of the NCDE grizzly bear population. Are Flathead Forest staff willing to let unknown people build houses on their private property, between their house and their neighbor's, simply because they already live in an area with houses? According to the Bug Creek EA and the Forest Plan, this would have no effect whatsoever on the staff's wellbeing!

The EA, at 18, proposes to construct 3.2 miles of new system road and to build another 10.1 miles of system road on "existing templates," presumably roads previously abandoned or decommissioned and removed from the system. These roads will then be managed as "impassable" system roads, with some exceptions requiring less intensive closure methods (Id). Impassable roads, however, need only be closed by a physical barrier to motorized vehicles in the first 50 feet and are allowed to continue functioning as a road and trail. Roads reclaimed and decommissioned under the 1986 Plan's Amendment 19 were required to have the entire road treated in such a way that they no longer function as either a road or a trail, motorized or non-motorized.

Rebuilding these reclaimed, abandoned and decommissioned roads and again allowing them to function as roads and trails fails to "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the 2018 Forest Plan. Ditto for the new system road

construction. For a more detailed discussion of this problem, see DVD 2, Folder 07, 2020-11-20 Doc. 97-1 Decl _ Keith Hammer.pdf and 2020-11-20 Doc. 97 Plaintiffs Joint Combined Reply.pdf. Please read those documents in their entirety as a part of these comments on the EA. For a broader discussion of these problems, please see in DVD 1 our Forest Plan Objection in Folder 00, our Roads to Ruin report and its supplements in Folder 04, our comments on the NCDE Conservation Strategy in Folder 22, and our comments on the NCDE Habitat-Based Recovery Criteria in Folder 21.

Moreover, even the 2 miles of roads to be decommissioned under the action alternatives would be managed simply as "impassable" roads and not be fully reclaimed (EA at 19). Similarly, a number of roads would have berms replaced with even less effective gates (Id). Worse yet, the newly constructed roads that aren't managed as "impassable" do get counted in TMRD (EA at 144), but that somehow still does not violate the Forest Plan standard allowing no increase in TMRD over the 2011 baseline!

These lessened protections for grizzly bear security do not "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the 2018 Forest Plan - even as they avoid detection in baseline parameters and values. The EA fails to discuss the ineffectiveness of berm and gate closures compared to road reclamation, the removal of culverts and bridges, and the re-vegetation of the entire road, rendering the EA inadequate in taking the hard look required by NEPA. (See DVD 2, Folder 07, 2020-11-20 Doc. 97-1 Decl _ Keith Hammer.pdf and 2020-11-20 Doc. 97 Plaintiffs Joint Combined Reply.pdf; and DVD 1, Folder 15, Swan_2004_Rd_Closure_Report.pdf).

The EA most often refers to closure of the Estes Lake "trail" to motorized use, while on page 183 it is referred to as an "NFS [National Forest System] ROAD." The EA remarkably claims that changing this road to "non-motorized" will increase Secure Core by 10% (page 145) while providing no background on the abuse and trespass of other bermed roads and trails in the area by ATV. To claim an effective increase in Core before the agency has proved the closures to be effective is arbitrary, capricious and an abuse of agency discretion. While we support closure of the Estes Lake road/trail to motorized use, we know from experience in the area that it will be quite some time, if ever, before ATVs and motorcycles quit trespassing all the way from Highway 35 at Woods Bay up through DNRC and FS land to Crane Mountain Road 498, as has been going on for decades.

See DVD 2, Folder 10, Weber Kehr Meeting 110620.pdf, pages 18-45 for photos and maps of ATV, motorcycle, and mountain bike trespass and unlawful trail building in this area. The EA makes no mention of the long history of such trespass and unlawful trail building, providing a biased view of building and/or designating new trails and roads in the area. We will go into this further when we get into the trail proposals in section 3 below.

Most importantly at this juncture, the EA fails to include a map of Secure Core in the affected subunits. Nor does it mention whether such maps exist in the Project File. It is impossible to figure out what the EA is talking about without a map of Secure Core before, during and after the project. The EA is totally inadequate in this regard and

must include these maps in the EA, not just in the Project File, as described in WildEarth Guardians' comments on page 5 and elsewhere.

Similarly, the EA provides no adequate timeline for the reportedly temporary increases in OMAD and TMAD or the temporary decreases in Secure Core. Nor does the EA adequately explain how these temporary deviations apply to the 10-year Bug Creek Project (EA at 136) when projects are not supposed to last more than 5 years and when such deviations are averaged over 10 years (see also WildEarth Guardians' comments at 17).

Nor does the EA provide an adequate timeline for these Bug Creek project deviations alongside the Mid-Swan project, which the EA (at 147) acknowledges "could have activities that contribute potential for disturbance to grizzly bear beginning in 2024 overlapping with the potential timeframe for implementation of Bug Creek activities." Nor does the Bug Creek EA provide a map of the grizzly bear subunits affected by the Bug Creek project, let alone those affected by the Mid-Swan and other nearby projects like Weed Lake and March Madness - all of which must be coordinated in time and space according to the Forest Plan in order to limit the displacement of grizzly bear from subunits. This leaves the public and decision maker blind in these regards and also is a failure to adequate disclose and discuss cumulative effects.

Similarly, the EA paints a confusing picture of denning habitat in the project area. On page 140, the EA says that restricted roads used for the project are "further than 3 km" from modeled denning habitat. It also says that almost "50% of the denning habitat in the project area is within 1 km to an open road (NFSR 498)." It also says alternative B and C have the potential to affect 43% and 36% of denning habitat, respectively, during the denning season, in addition to the ongoing impacts of snowmobiling and snowmobile grooming of Road 498 during those winter denning months. Yet the EA provides no map of where the denning habitat is located so the public and decision maker can better understand these significant impacts. These are among the many reasons that an EIS is required, in addition to those described by WildEarth Guardians on pages 2-4 of their comments.

3. Proposed and Existing Trails

The EA fails to adequately describe the existing and past circumstances regarding unlawful road and trail trespass and construction in the project area. The area where trails are proposed to be added to the system is riddled with unauthorized routes that the Forest Service has refused to physically close to use by ATVs and mountain bikes. Now the Forest Service wants to reward that unlawful activity by designating some of those routes as non-motorized system trails, as though the decades-long ATV use will simply disappear and the unlawful trail building will magically cease.

See the entire contents of DVD 2, Folder 10 for a small fraction of the 7 gigabytes of photos and other documentation we compiled of the unauthorized trail building, ATV trespass and unauthorized building of mountain bike "features" on then-already-system trails on Crane Mountain (Beardance, Crane Creek and Phillips trails):

Weber Kehr Meeting 110620.pdf is a slide show presented to the Forest Supervisor and District Ranger in 2011, summarizing the unauthorized expansion of the Crane Mountain trail network for mountain biking, the unauthorized building of mountain bike "features" on already-system trails by a Forest Service volunteer, and the unlawful use of a number of these trails and roads by motorized ATVs and motorcycles. This summary includes on page 37 an acknowledgement by then Recreation Forester Andrew Johnson that unauthorized trails can take 50 years to heal.

Probable Cause Statement re Cron.pdf is a 2011 Statement of Probable Cause by Forest Service Law Enforcement Officer Jody Freund, documenting his issuing Ron Cron a Violation Notice for constructing an unauthorized mountain bike trail on Crane Mountain in 2009.

The Subfolder "Facebook" contains a series of Facebook posts by Ron Cron and others in the "Open Group - Crane Mountain Trails Supporters, A group of dedicated mountainbikers that are willing to build and maintain a trail system on Crane Mountain."

Cron to Hammer 110612.pdf is a message from Ron Cron to Keith Hammer, denying him access when the Crane Mountain Trail Supporters group switched to "private" on Facebook.

The Subfolder "Press" contains articles about the public controversy surrounding the Crane Mountain trails and other mountain biking issues.

Bear Dance Trail Cron 110610.mov is an audio recording of Ron Cron at his fundraiser for Crane Mountain trails claiming he had Forest Service permission to build mountain bike jumps the whole length of the Beardance Trail.

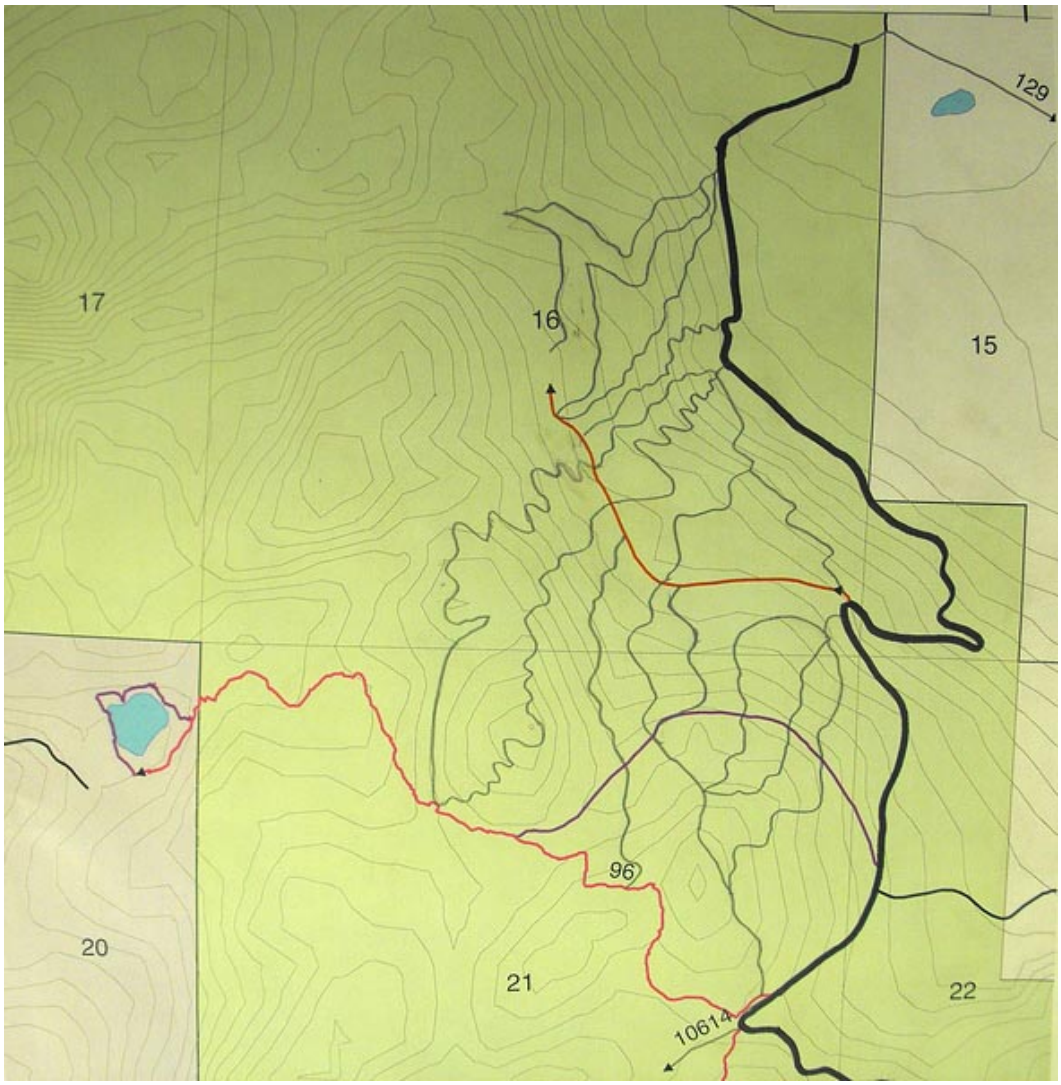
Sprunger Bike Cartoon.pdf is a political cartoon by Jerry Sprunger from the Bigfork Eagle newspaper, inspired by the Crane Mountain controversy and depicting the conflicts between speeding mountain bikers and hikers.

SVC to Kehr re Beardance 111009.pdf is a letter from Swan View Coalition to the District Ranger, thanking him for the removal of some of the mountain bike jumps and ramps from the Beardance and Crane Creek trails, but asking for the removal of more of them.

Kehr to SVC 121017.pdf is a letter from the District Ranger to Keith Hammer/SVC, thanking him for walking the Beardance Trail with him, his recreation staff, and Ron Cron - and announcing some of the mountain bike features would be removed from the Beardance Trail to meet Forest Service Handbook directives: "At a number of locations, constructed mountain bike features have been added by volunteers and others. Some of these features provide a path through wet areas or water crossings while other features were added for the sole purpose of providing challenge features for mountain bikers."

121030 SVC to Kehr opt.pdf is SVC's response to the District Ranger, thanking him for writing he'd remove "challenge features" but asking him to be more specific about which features would remain or be removed. We received no feature-by-feature response to the photos we provided. While many of those features were subsequently removed, a number of them remain to this day.

The Subfolder "Crane Maps from Pinkbike" are maps posted by Ron Cron to Pinkbike.com. They show a complex network of trails both above and below Road 10213, a couple of which are documented in Weber Kehr Meeting 110620.pdf. One of those maps is included below, as an example:



The EA relates none of this history. On page 87, the EA instead vaguely alludes to the fact that some of these trails already exist by saying a "proposed trail system would create or designate approximately 17 miles of non-motorized trails," concluding "As various user groups develop a sense of ownership for their favorite trails, then volunteer to adopt and maintain them, the need to utilize Forest Service funds for maintaining many of these trails may decline over time."

The EA is being unacceptably coy about what parties and "various user groups" want the proposed trail system and what parties the Forest Service might accept as volunteers and partners in this undertaking. It's pretty obvious one user group already built a bunch of mountain bike trails in the area. Will the "pack and saddle" trails connect with trails on adjacent private lands and would those trails be available for guided horseback trips? NEPA requires full disclosure of what is being contemplated here, before commitments are made or actions are taken. Instead the EA is silent and the Forest Service has allowed actions to be taken.

The Forest Service took two years to fine one person for building one of the unauthorized mountain bike trails (after the unauthorized trail building was exposed publicly) where the adoption of numerous such trails into the trail system is now proposed. Then the FS refused to issue legal closure orders to keep those trails from being used and maintained as mountain bike trails, with a number of them also being used as unauthorized motorized trails. Now the EA portrays the situation as though the FS is starting from scratch and that it and its volunteers can be trusted to do the right thing.

This type of behavior sets a horrible precedent, especially when the Forest Service turns around and sanctions trails that were unlawfully constructed. A similar situation is unfolding in Krause Basin as mountain bikers clear living trees, deadfall and brush from unauthorized routes and reportedly add those routes to maps on trailforks.com. Swan View Coalition showed Ranger Dowling some of this route clearing on 8/10/18, but the trail clearing has continued while "collaborative" planning for the Krause Basin area is not scheduled to begin until 2021. How many of these unauthorized routes will mountain bikers and ATV riders champion during that process because the Forest Service stood aside and let unauthorized trails be cleared?

The Bug Creek EA contains no adequate map of the existing unauthorized road and trail system on Crane Mountain. Nor does it adequately describe the law enforcement problems that the proposed designation of 17 miles of trails is supposed to magically remedy. Nor does the EA show which of the many trails that apparently already exist (see DVD 2, Folder 10, Subfolder "Crane Maps from Pinkbike" and the map above) would be designated as "system" trails and whether the others, including the now long-established network below Road 10213, would continue to receive mountain bike and motorized use as we have documented before. Nor does the EA describe how motorized and non-motorized use will finally be barred from these non-designated trails, if that is even the intention of the Bug Creek Project.

Human uses of these trails, both motorized and non-motorized, displaces wildlife including elk and bears. The EA, at 146, claims that non-motorized recreation has not been shown to have population-level effects on grizzly bear - immediately after citing Fortin et al. (2016), which did find such population-level effects. Nor is population-level effects the only appropriate scale for determining project-level effects and IT.

The EA fails to mention the research of Preisler et al (2013) that finds that mountain bikes are a close second to motorized vehicles for displacing elk and are more disruptive than hiking or horseback riding. The EA also fails to mention Naidoo and

Burton (2020), who found that mountain bikes displace moose and grizzly bear more than motorized vehicles! (See DVD 2, Folder 04 for these research papers).

Nonetheless, the EA at 146, claims that "Secure Core created by the removal of motorized use on Estes Lake trail would overlap proposed non-motorized trails." This bit of magic is only accomplished by discarding the former Forest Plan Amendment 19's acknowledgement that high-use non-motorized trails disqualify areas from being considered Security Core. Building, allowing and designating high-use non-motorized trails in areas considered Secure Core does not "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the 2018 Forest Plan. It instead institutionalizes human impacts to bears and other wildlife without it registering as a decrease in Secure Core or an increase in route densities. (See DVD 2, Folder 07, 2020-11-20 Doc. 97-1 Decl _ Keith Hammer.pdf and 2020-11-20 Doc. 97 Plaintiffs Joint Combined Reply.pdf. See also in DVD 1 our Forest Plan Objection in Folder 00, our Roads to Ruin report and its supplements in Folder 04, our comments on the NCDE Conservation Strategy in Folder 22, and our comments on the NCDE Habitat-Based Recovery Criteria in Folder 21).

The EA's assessment of the effects of non-motorized trails is wholly inadequate. Moreover, the EA unsuccessfully attempts to argue that roads and logging do not have population-level impacts on grizzly bears either, a slap in the face to decades of research and policy documents even the NCDE Conservation Strategy dared not confront (EA at 136). Rather than attempting a revision of history, the EA should perhaps look at more recent research showing that all sorts of human disturbances displace grizzly bears and effectively shrink their habitat - and that proxies such as road densities are not as adept at estimating that displacement than the Cumulative Outdoor Activity Index proposed. (See DVD 2, Folder 04, Corradini et al 2020 in Press.pdf).

4. Cumulative Effects

In the two years since the 2018 Forest Plan was finalized, the Flathead has proposed or implemented 7 timber sale projects of note, including Bug Creek. Those 7 projects are rebuilding 26.3 miles of historic roads and returning them to the road system to be managed as "impassable" to motor vehicles. In addition, they are building 43.5 miles of new permanent system roads, for a total of 69.8 miles. This is more than 20 times the road miles built in the Flathead's grizzly bear habitat from 1996 - 2010 under Amendment 19 (3.2 miles that were largely road re-routes. See DVD 2, Folder 07, 2020-11-20 Doc. 97-1 Decl _ Keith Hammer.pdf)! This does not "maintain the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population." Those 2011 conditions were governed by Forest Plan Amendment 19, which primarily drove the decommissioning of 900 miles of roads under the 1986 Forest Plan (2018 Forest Plan DEIS, Vol. 1, at 117).

Those 7 projects being planned and implemented in the first 2 years of the 2018 Forest Plan, propose only 46 miles of road decommissioning - with only 2 miles of that proposed in Bug Creek. Almost all of it is proposed as aquatic restoration in the Mid-Swan Project, which notes that funding for that decommissioning is not guaranteed, while reneging on 59.8 miles of road decommissioning never funded and implemented

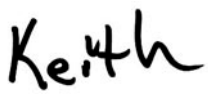
in the Crane Mountain area, as mentioned above. (See DVD 2, Folder 07, 2020-11-20 Doc. 97-1 Decl _ Keith Hammer.pdf). Moreover, the Mid-Swan road decommissioning, if it gets implemented, is likely to be the bulk of the 30 - 60 miles that might be "decommissioned or stored" over the 15-year life of the 2018 Plan. (11/22/17 FWS BiOp on the 2018 Forest Plan, at II-49).

Perhaps equally as important, those 7 projects propose to build 68 miles of new mountain bike, horseback and hiking trails, all human uses known to displace grizzly bears and other wildlife. (See DVD 2, Folder 07, 2020-11-20 Doc. 97 Plaintiffs Joint Combined Reply.pdf; DVD 2, Folder 04, Naidoo and Burton 2020.pdf; and DVD 1, Folder 24, Fortin et al 2016.pdf, Kasworm Manley 1990 roads and trails.pdf, Ladle_et_al-2018-Journal_of_Applied_Ecology.pdf, Mace and Manley 1993.pdf, Mace and Waller 1997.pdf, and Mace and Waller_1997 errata.pdf).

Nowhere does the 2018 Forest Plan, its EIS or the Bug Creek EA provide an adequate cumulative effects analysis to determine whether the Plan and its various projects are "maintain[ing] the on-the-ground [2011] conditions that have contributed to the growth and expansion of the NCDE grizzly bear population," as required by the Forest Plan. We have provided good evidence that they are not maintaining those on-the-ground conditions due to design, definition and implementation. We repeat here our request for a Bug Creek EIS that adequately details these cumulative effects and remedies the other inadequacies of the EA that we have detailed in these comments.

Thank you for this opportunity to comment and please keep us posted about this project.

Sincerely,



Keith J. Hammer
Chair

ATTACHMENT D

December 11, 2020

Chris Dowling
District Ranger, Swan Lake Ranger District
Flathead National Forest
200 Ranger Station Road
Bigfork, MT 59911

Submitted via email to: comments-northern-flathead-swan-lake@usda.gov

Re: WildEarth Guardians Comment on Bug Creek Integrated Resource Management Project Environmental Assessment

To District Ranger Dowling,

WildEarth Guardians respectfully submits these comments to the U.S. Forest Service concerning the agency's analysis in its Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) of the Bug Creek Integrated Resource Management Project (Bug Creek). The Flathead National Forest, Swan Lake Ranger District (District) is proposing timber harvest and prescribed burning activities within an approximately 31,3051 acre project area purportedly for fuels reduction and forest restoration management. Additional actions include transportation management and recreation activities. Specifically, Alternative B is the proposed action and would authorize commercial harvest of 2,184 acres, including regeneration harvest in up to four units that will exceed size limitations under the forest plan and therefore requires regional forester approval. The proposed action also includes construction of 5.3 miles of temporary roads and 13.1 miles of new system roads, of which 10.1 miles would occur on existing road templates. EA at 17-18, Tables 1 and 2. In addition, the proposed action would seasonally open 3.4 miles of FSR #9714 in order to create a loop opportunity for motorized recreation, thereby increasing related disturbance in the Crane Mountain area. *Id.* at 88.

WildEarth Guardians is a nonprofit conservation organization with offices in Montana and five other states. We have more than 188,000 members and supporters across the United States and the world. Guardians' mission is to protect and restore wildlife, wild places, wild rivers, and the health of the American West. WildEarth Guardians has organizational interests in the proper and lawful management of the forest road system and its associated impacts on the Flathead National Forest's wildlife and wild places.

WildEarth Guardians submitted timely scoping comments with Swan View Coalition, Friends of the Wild Swan and Brian Peck raising significant concerns with the Bug Creek Forest Health and Fuels Reduction Project proposal. The current proposed action under Alternative B fails to address the concerns specified in our scoping comments.

WildEarth Guardians supports and incorporates by reference here the Swan View Coalition's Bug

Creek EA comments submitted by Keith Hammer.

I. Clarify that the Forest Service is applying the 1978 CEQ NEPA regulations.

The Council on Environmental Quality ("CEQ") recently revised its regulations implementing NEPA. 85 Fed. Reg. 43,304 (July 16, 2020) (codified at 40 C.F.R. Part 1500). Here, the Forest Service does not clearly indicate which version of the CEQ NEPA regulations it is applying to this analysis (previous, 1978 rules, or 2020 rules). Rather, the agency simply asserts that the "EA complies with the Council on Environmental Quality's (CEQ) Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA; 40 CFR Parts 1500-1508), ..." EA at 7. Regardless, because the NEPA process for this project started before Sept. 14, 2020, the Forest Service should exercise its discretion to apply long-standing, pre-2020 NEPA regulations and policy. 40 C.F.R. § 1506.13 (2020) (giving discretion to agencies regarding effective date for ongoing NEPA processes). The 1978 regulations codified early judicial opinions based on language of the statute, provided the basis for a substantial body of judicial precedent spanning over four decades, and have formed the foundation for more specific regulations and policies enacted by individual agencies to implement their particular missions. *See*, *e.g.*, 36 C.F.R. Part 220 (2008), Forest Service Manual 1950, and Forest Service Handbook 1909.15.

The 2020 CEQ revised rules upend virtually every aspect of NEPA and its longstanding practice, contradicts decades of court interpretations of NEPA's mandates, and undercuts the reliance placed on NEPA by the public, decision-makers, and project proponents. It does so by limiting the scope of actions to which NEPA applies, eviscerating the thorough environmental analysis that lies at the heart of the statute, reducing the ability of the public to participate in federal agency decision-making, and seeking to limit review of agency NEPA compliance. The legality of the final rule is being challenged in a number of federal lawsuits brought by organizations that rely on NEPA to protect their varied interests in human health and the environment. *See Alaska Community Action on Toxics v. CEQ*, No. 3:20-cv-05199 (N.D. Cal. July 19, 2020); *see also Wild Virginia v. CEQ*, No. 3:20-cv-00045-NKM (W.D. Va. July 29, 2020); Environmental Justice Health Alliance v. CEQ, No. 1:20-cv-06143 (S.D.N.Y. Aug. 6, 2020).

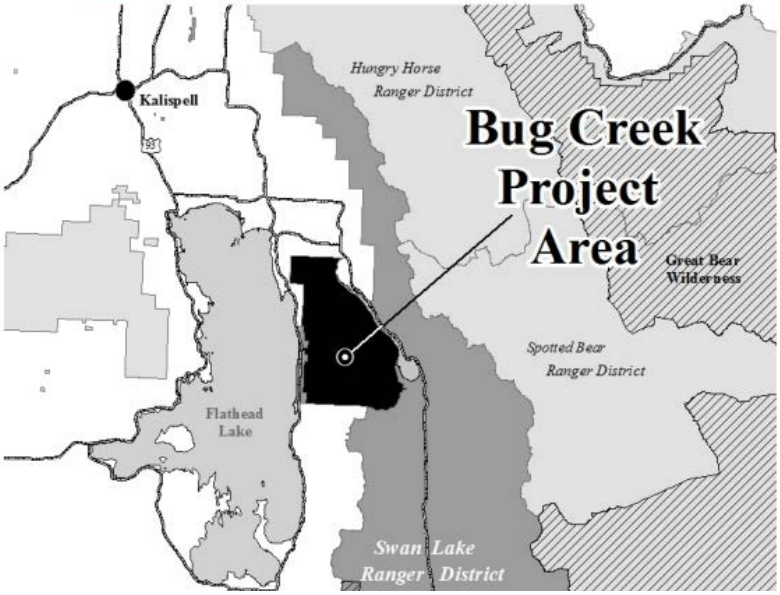
Given the highly uncertain fate of the CEQ's 2020 rules – including pending legal challenges and a new administration set to begin in 2021 – the Forest Service would be wise not to jeopardize or delay ongoing decision-making processes by injecting additional and unnecessary uncertainty. In short, continuing to apply the CEQ's 1978 regulations is the path to greater certainty, given the agency's clear discretion to do so with respect to this process, which was initiated before September 14, 2020.

II. This project needs an Environmental Impact Statement (EIS).

The Forest Service must prepare an EIS because this project may have a significant impact on the environment. The Council for Environmental Quality's (CEQ) regulations define significance in terms of context and intensity, which includes inter alia the scope of beneficial and adverse impacts, unique characteristics of the geographic area, degree of controversy, degree of uncertainty, and degree to which an action may affect species listed or critical habitat designated under the Endangered Species Act. 40 C.F.R. § 1508.27 (defining "significantly"). We note that this project may significantly affect the human environment because, *inter alia*, it:

- Is significant within the context of society as a whole, the affected region, affected interests, and locality. This project is less than two miles from a second, major project proposed by the Forest Service that is among the first projects to implement the Flathead's newly revised Forest Plan. Given the proximity of these projects (separated by only two small creek drainages, Gildart and Porcupine Creeks) and the precedential nature of both projects implementing new forest plan components that are much weaker than the previous forest plan components, this project is significant.

Figure 1. Map exhibiting the project area location.



- Will cause significant impacts, both beneficial and adverse. The Forest Service readily acknowledges that the project will be beneficial by improving suitable habitat conditions for rare plants, EA at 81, and "improve the diversity and resilience of forest vegetative communities." *Id.* at 100. At the same time, the agency discloses the fact that "[l]oss of hiding cover and existing foraging habitat across large areas would have an adverse effect on snowshoe hare and lynx in the short-term, but forage habitat would then increase for approximately 20 years following wildland fire as regenerating stands grow into stand initiation foraging habitat." EA at 121. Additionally, the Forest Service proposes to construct 13.1 miles of new system roads, with 10.1 miles occurring on existing road templates, which demonstrates past failures to properly decommission road segments, and will increase an already oversized, under-funded, and under-maintained road system that may cause significant impacts to the landscape and nearby waters, especially given the best available science showing forest roads are major sources of sediment to receiving waters. *See* WildEarth Guardians, *The Environmental Consequences of Forest Roads and Achieving a Sustainable Road System*, March 2020 (Attachment A).

- Involves a geographic area with unique characteristics, specifically old growth habitat where the proposed action includes regeneration harvest adjacent to or within 40 units that contain old growth habitat. EA at 111-112. The project area also includes 76 acres that are

currently eligible as a Wild and Scenic River designation, and 654 acres that are within Designated Research Natural Areas. EA at 180.

- Will result in effects on the human environment that are likely to be highly controversial. Recent scientific publications raise serious questions as to the efficacy of vegetation treatments in reducing uncharacteristic wildfire risk and increasing forest resilience. Our comments show that such "resistance" strategies that attempt to mimic historical conditions are inherently flawed, especially during changing climate conditions, because they fail to utilize reference conditions based on current and future ranges of variability. The Forest Service fails to address this scientific controversy. Additional controversial aspects of this proposal include the "regeneration harvest" (clearcuts), including some clearcuts that exceed maximum limits under the Forest Plan.

- Involves effects that are highly uncertain or involve unique or unknown risks. The concerns identified in the previous bullet equally apply here. Additional uncertain or unknown risks also include the impacts of the proposed regeneration harvests, especially given the lack of information provided in the EA and public notice regarding the proposal to include clearcuts that exceed maximum limits under the Forest Plan.

- Is very likely to establish a precedent for future actions with significant effects, as noted above in being one of the first projects to implement the Flathead's revised Forest Plan.

- Is related to other actions with cumulatively significant impacts, as noted above in being geographically very close to the Mid-Swan Project. The Forest Service may not avoid the significance of these two projects simply because they are separate projects or some of the actions (i.e., roads) are labeled temporary.

- May significantly affect species listed or critical habitat designated under the Endangered Species Act, including grizzly bear, Canada lynx, and bull trout. The Forest Service states that "Alternative B would have the largest potential impact to grizzly bears contributing to potential disturbance as it proposes the greatest amount of road use, road construction and vegetation treatment of the project alternatives in the Crane Mountain subunit." EA at 135. Given that the Crane Mountain Grizzly Bear Subunit already exceeds secure core thresholds determined necessary to the survival and recovery of grizzly bears, adding more road miles to the system and authorizing up to ten years of heavy truck hauling on these routes is a significant impact that warrants an EIS. The Forest Service also states that "Approximately 59 percent of the North Crane LAU and 82 percent of the South Crane LAU is designated as Canada lynx critical habitat." EA at 128. The impacts to ESA-listed species and designated critical habitat will be significant.

- Threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment. As explained throughout this comment, as proposed, the Bug Creek Project threatens numerous violations of law.

For these reasons, the Forest Service should prepare an EIS instead of an EA, and provide the draft version of that EIS to the public for comment.

III. The Forest Service improperly relies on internal project files and fails to make them publicly available, thereby precluding opportunity to provide meaningful public comments.

CEQ's 1978 NEPA regulations direct that information used to inform NEPA analysis "must be of a high quality" and that "[a]ccurate scientific analysis . . . [is] essential to implementing NEPA." 40 C.F.R. § 1500.1(b). In order to ensure Forest Service officials meet this standard, the agency's regulations provide further direction for environmental assessments, including that the EA "[m]ay incorporate by reference data, inventories, other information and analyses." 36 C.F.R. § 220.7(b)(3)(v); § 220.4(h) (Incorporation by reference). Specifically, the Forest Service's regulations allow the agency to prepare an EA, "in any format useful to facilitate planning, decision making, and public disclosure as long as the requirements of paragraph (b) of this section are met." 36 C.F.R. § 220.7(a). However, that regulation also states that "[t]he EA may incorporate by reference information that is *reasonably available to the public*." *Id.* (emphasis added).

In the Bug Creek EA, the Forest Service made at least 151 references to project files without making any publicly available. Especially during the current COVID pandemic when science-based public health and safety guidelines set forth by the Center for Disease Control caution against unnecessary travel to public spaces, forcing the public to physically appear to review these project files in the Forest Service's possession does not meet the agency's own rule requiring these referenced files to be "reasonably available to the public." In several instances the agency relied on these internal documents in order to support conclusory statements or in place of providing the requisite analysis, for example:

- When disclosing the methods for determining potential effects to water quality, aquatic habitat/stream morphology and aquatic species, the agency explains, "[s]ediment delivery from new proposed roads, both temporary roads and NFS roads, follows methodology outlined in project file exhibit D-04 while delivery from all roads (including historic roads) associated with culvert replacement, removals, and failure follow guidance outlined in project file exhibit D-05." EA at 44-45. By failing to fully disclose the analysis methods in the EA, the Forest Service precludes the opportunity to provide meaningful input on the resulting analysis. This is especially true for known historic roads that may not be fully vegetated or where remnant road templates have been subject to erosion. In fact, it is unclear what the Forest Service considers as a "failure" since the methods were not properly disclosed.

- When discussing the need for changes to the transportation system, the Forest Service explains "[a] travel analysis report was prepared to identify the need for changes to the NFS road system and can also be found in project file exhibit J-01. A summary of the proposed motorized management actions is provided in Table 2." EA at 18. The agency fails to disclose any specific results from the Bug Creek Travel Analysis Report (TAR), and the EA makes only this one reference to it at all. At no point does the analysis disclose the TAR's methods or the resulting risk and benefit scores for roads where it proposes changes, or for the existing road templates proposed to be added to the transportation system.

- The Forest Service omits any of the maps it references when discussing how the project area relates to important wildlife habitat, including sensitive species and ESA-listed species. In particular, in its analysis of potential effects to bull trout and its designated critical habitat, the Forest Service states that "[e]ffects would not overlap designated critical bull trout habitat (project file exhibit D-05, map 1)." EA at 51. Review of map 1 in this project file is crucial to understanding the basis for the agency's "no effect" determination regarding ESA-listed bull trout and its critical habitat. Yet the Forest Service does not provide this information, precluding meaningful public review or understanding of its assertions in the EA.

The Forest Service should disclose the materials incorporated by reference on the project webpage to make them "reasonably available to the public," and re-notice the draft analysis to allow a comment period that provides for meaningful public comment.

IV. Acknowledge significant controversy and uncertainty for vegetation treatments.

The Forest Service explains that the purposes of this project are to reduce wildfire risk within the wildland-urban interface and to improve forest resilience due to insect and disease degradation. EA at 10-11. In support of these, the agency cites the departure from historic conditions due to fire suppression and exclusion, as well as the need to return western white pine, ponderosa pine and western larch to its historical, native range. EA at 10. To ensure that the agency has taken the required "hard look," courts hold that the agency must utilize "public comment and the best available scientific information." *Biodiversity Cons. Alliance v. Jiron*, 762 F.3d 1036, 1086 (10th Cir. 2014) (internal citation omitted). Here, the Forest Service fails to provide adequate information that supports the widespread use of specific proposed treatments. Specifically, as we detail below, the agency fails to demonstrate its proposed action will effectively achieve the intended purposes and meet the stated needs to support its vegetative treatments.

A. Climate Change & Historical References

Many of the underlying assumptions for the purpose and need relies on the departure from historic conditions, (i.e. "uncharacteristic fire and insect/disease disturbances.," EA at 93, see also 56, 81, 164). Yet, when relying on such historic conditions to inform vegetative treatments the Forest Service must account for the fact that climate change is fundamentally altering the agency's assumptions about the efficacy of the proposed actions. In other words, the Forest Service cannot rely solely on historic reference conditions to formulate its vegetation treatments. Rather, the agency must also include current reference conditions from areas that have a passive management emphasis, in addition to future reference conditions based on the best available climate models.

Recent science supports the need to look beyond historical references to inform proposed actions: "in a time of pervasive and intensifying change, the implicit assumption that the future will reflect the past is a questionable basis for land management (Falk 2017)." Coop et al., 2020. While it is useful to understand how vegetative conditions have departed from those in the past, (and the role mixed-severity fire played in Ponderosa pine dominated stands), the Forest Service cannot rely on them to define management actions, or reasonably expect the action alternatives will result in restoring ecological processes. Given changing climate conditions, the Forest Service should have emphasized reference conditions based on current and future ranges of variability, and less on

historic departures. Further, the agency needs to shift its management approach to incorporate the likelihood that no matter what vegetation treatments it implements, there are going to be future forest wildfire-triggered conversions to other vegetation types. As such, the Forest Service cannot rely on the success of resistance strategies, as Coop 2020 demonstrates:

> Contemporary forest management policies, mandates, and science generally fall within the paradigm of resisting conversion, through on-the-ground tactics such as fuel reduction or tree planting. Given anticipated disturbance trajectories and climate change, science syntheses and critical evaluations of such resistance approaches are needed because of their increasing relevance in mitigating future wildfire severity (Stephens et al. 2013, Prichard et al. 2017) and managing for carbon storage (Hurteau et al. 2019b). Managers seeking to wisely invest resources and strategically resist change need to understand the efficacy and durability of these resistance strategies in a changing climate. Managers also require new scientific knowledge to inform alternative approaches including accepting or directing conversion, developing a portfolio of new approaches and conducting experimental adaptation, and to even allow and learn from adaptation failures.

Coop et al., 2020. Equally important to acknowledging the limitations of resistance strategies is the fact that other pertinent scientific findings show warming and drying trends are having a major impact on forests, resulting in tree die-off even without wildfire or insect infestation. See, e.g., Parmesan, C. 2006; Breshears et al. 2005; Allen et al. 2010, 2015; Anderegg et al. 2012; Williams et al. 2013; Overpeck 2013; Funk et al. 2014; Millar and Stephenson 2015; Luo and Chen 2015 ("Our results suggest that the consequences of climate change on tree mortality are more profound than previously thought"); Gauthier et al. 2015; Ault et al. 2016 ("business-as-usual emissions of greenhouse gases will drive regional warming and drying, regardless of large precipitation uncertainties"); Vose et al. 2016 ("In essence, a survivable drought of the past can become an intolerable drought under a warming climate").

Given the fallacies of using historic conditions as a reference for desired conditions coupled with the uncertainty of those treatments to maintain or restore ecological integrity in the context of climate change and likely forest conversion scenarios, the Forest Service must reevaluate its assumptions about its proposed vegetative treatments, especially in regards to restocking success and species composition. Significant controversy exists as to the need for such treatments given the improper use and reliance on historic conditions. In fact, there is a high likelihood based on the aforementioned studies that some areas will not regenerate and will instead result in conversion to different vegetative groups. NEPA mandates that the agency address this controversy and science that contradicts agency assumptions in an EIS.

In addition to the questionable success of the Forest Service's pursuit of resistance strategies underlying its proposed actions, the agency must also reconsider numerous other assumptions in its scoping report documents. In fact, many of the agency's assumptions run contrary to the most recent science regarding the impact of logging on wildfire behavior, resilience of the forest to large-scale disturbances, and ability to provide quality wildlife habitat. Many of the following scientific studies call into question the Forest Service's assumption that its proposed actions will achieve the stated purpose and need.

/// /// ///

B. Assumptions and Uncertainty About Vegetation Treatments and Wildfire

The Forest Service states that "reduced stand densities, retaining larger-diameter fire-resistant species, managing surface fuel layers, and increasing height to live crowns, has had positive effects on tree and stand survivability, decreased crown fire activity, decreased surface fire potential, and decreased fire severity (Graham et al. 1999; Omi & Martinson 2002; Skinner et al. 2002; Agee & Skinner 2005)." Much of the agency's analysis focuses on reduced flame-lengths and crown fire potential based on several models. EA at 55-56, 58-60. Ultimately, the Forest Service concludes that "[i]n general, the more acres of effective hazardous fuels and slash reduction treatments, the lower the fuel hazard and subsequent fire behavior characteristics." EA at 59.

Ultimately, we question the agency's assumptions that reducing tree densities and fuel loadings will result in less intense fire behavior. *See* Powell, H. 2019 (Attachment B) ("what fire scientists call a forest's 'fuel load' is not the main cause of large, unstoppable fires; it's climate factors such as temperature, humidity, and especially wind. But the weather is ephemeral and invisible, while thick underbrush is easy to see and photograph"). *See also* ProPublica article, Despite What the Logging Industry Says, Cutting Down Trees Isn't Stopping Catastrophic Wildfires, 2020 (Attachment C); Best, Colorado's Troublesome megafire, Nov. 2020 article in Mountain Town News (Attachment D).

Science shows that fuel treatments have a modest effect on fire behavior, and that fuel reduction does not necessarily suppress fire. Lydersen, et al., 2014 (explaining that reducing fuels does not consistently prevent large forest fires, and seldom significantly reduces the outcome of large fires). Studies from the Forest Service's own Rocky Mountain Research Station refute the Forest Service's assumptions that vegetation treatments will result in less intense fire behavior. Calkin, D.E., et al., 2014 (explaining, "[p]aradoxically, using wildfire suppression to eliminate large and damaging wildfires ensures the inevitable occurrence of these fires.").

Large fires are driven by several conditions that completely overwhelm fuels. Meyer, G and Pierce, J. 2007. Because weather is often the greatest driving factor of a forest fire, and because the strength and direction of the wildfire is often determined by topography, fuels reduction projects cannot guarantee fires of less severity. Rhodes, J. 2007, Carey, H. and M. Schumann, 2003.

Vegetation treatments based on historical reference conditions to reduce high-intensity wildfire risk on a landscape scale is undermined by the fact that land managers have shown little ability to target treatments where fires later occur. Barnett, K. et al, 2016, Rhodes, J. and Baker, W. 2008 (finding that fuel treatments have a mean probability of 2-8% of encountering moderate- or high- severity fire during the assumed 20-year period of reduced fuels). Analysis of the likelihood of fire is central to estimating likely risks, costs and benefits incurred with the treatment or nontreatment of fuels. If fire does not affect treated areas while fuels are reduced, treatment impacts are not counterbalanced by benefits from reduction in fire impacts. Results from Rhodes and Baker 2008 indicate that "even if fuel treatments were very effective when encountering fire of any severity, treatments will rarely encounter fire, and thus are unlikely to substantially reduce effects of high-severity fire."

Fuel treatments could even make fire worse—exacerbating the problems the Forest Service is claiming to address. Fuel reduction may actually exacerbate fire severity in some cases as such projects leave behind combustible slash, open the forest canopy to create more ground-level biomass, and increase solar radiation which dries out the understory. Graham, R.T., et al, 2012,

Martinson, E. J. and P. N. Omi, 2013 (finding that in about a third of cases reviewed mechanical fuel reductions increased fire spread).

We question the wisdom of attempting to control wildfire instead of learning to adapt to fire. See Powell 2019 (noting that severe fires like the 2017 Rice Ridge fire on the Flathead National Forest are inevitable and unstoppable). See also Schoennagel, T., et al., 2017 (explaining, "[o]ur key message is that wildfire policy and management require a new paradigm that hinges on the critical need to adapt to inevitably more fire in the West in the coming decades"). The Forest Service recognizes that past logging and thinning practices may have actually increased risk of intense fire behavior on this landscape. But instead of learning from these past mistakes, here the Forest Service is committing to the same mistakes by proposing to continue to log the landscape.

We question the need to reduce wildfire, a natural forest process. While some may view wildfires as tragic and the aftermath as a destruction zone, natural ecology shows otherwise. See Powell 2019 (explaining how a young burned forest is an essential natural process and "nature's best-kept secret," providing new habitat for a plethora of birds, abundant wildflowers, insects, mushrooms, etc.). Impacts from climate change, including changing weather patterns and drought, are the driving factors for wildfires. *Id.* Instead of focusing on thinning and prescribed burning to manage the forest, the Forest Service should focus on how it needs to change its practices to adapt to the changing climate.

At an absolute minimum, these studies demonstrate that the proposed treatments are controversial, ill-supported, and have the potential for significant impacts requiring preparation of an EA or EIS.

C. Assumptions and Uncertainty About Vegetation Treatments and Forest Resilience

The Forest Service asserts that its proposed action will increase forest resilience threatened by potential insects and disease, even though such occurrences are part of natural disturbances and, for mountain pine beetles, remain below epidemic levels. EA at 10. The best available science brings into question many of the Forest Service's underlying assumptions about the efficacy of vegetation treatments in reducing the effects from what can be characterized as natural disturbances and a response to changing climate conditions. See Hart, S.J., et al., 2015 (finding that although mountain pine beetle infestation and fire activity both independently increased with warming, the annual area burned in the western United States has not increased in direct response to bark beetle activity); see also Hart, S.J., and D.L. Preston. 2020 (finding "[t]he overriding influence of weather and pre-outbreak fuel conditions on daily fire activity . . . suggest that efforts to reduce the risk of extreme fire activity should focus on societal adaptation to future warming and extreme weather"); see also Black, S. H., et al., 2010 (finding, inter alia, that thinning is not likely to alleviate future large-scale epidemics of bark beetle); see also Six, D.L., et al., 2018 (study that found during mountain pine beetle outbreaks, beetle choice may result in strong selection for trees with greater resistance to attack, and therefore retaining survivors after outbreaks—as opposed to logging them—to act as primary seed sources could act to promote adaptation); see also Six, D.L. et al., 2014 (noting "[s]tudies conducted during outbreaks indicate that thinning can fail to protect stands").

Ultimately, science provides only weak support for vegetative treatments as a way to improve forest resilience to large-scale disturbances such as high severity crown fire and insects, and numerous studies question this approach or have found it to be ineffective. In addition, all mechanized fuel treatments guarantee damage to ecosystem components, including soils, mycorrhizal networks,

aquatics, and vegetation; they also have the potential to spread exotic plants and pathogens. Any subsequently prepared NEPA document must address these impacts.

D. Address Science Refuting Assumptions in the Statement of Purpose & Need

The Forest Service must provide support for the claimed needs for this project, especially where existing science contradicts the agency's assumptions. In the very least, the Forest Service must explain why best available science refuting its assumptions, outlined in the following paragraphs, does not apply to this project.

V. Assess and disclose direct, indirect, and cumulative impacts, including detailed, site-specific information.

NEPA requires the Forest Service to "[e]ncourage and facilitate public involvement in decisions which affect the quality of the human environment." 40 C.F.R. § 1500.2(d). A critical part of this obligation is presenting data and analysis in a manner that will enable the public to thoroughly review and understand the analysis of environmental consequences. NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most importantly, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. 40 C.F.R. § 1500.1(b). The Data Quality Act expands on this obligation, requiring that influential scientific information use "best available science and supporting studies conducted in accordance with sound and objective scientific practices." Treasury and General Government Appropriations Act for Fiscal Year 2001, Pub.L. No. 106-554, § 515.

A. Disclose site-specific information.

The Forest Service should provide detailed, site-specific information regarding existing conditions and how the proposed action will affect forest resources as well as wildlife and wildlife habitat. We are particularly concerned about the Forest Service's lack of disclosure regarding site-specific impacts to wolverine, Canada lynx and lynx habitat, bull trout, water quality, and grizzly bears. As noted in section III above, the Forest Service fails to disclose the location of proposed activities in relation to wildlife that may be present in the project area and important wildlife habitat.

As another example, the Forest Service fails to provide sufficient information regarding the clearcuts that will exceed maximum limits. The EA states that under Alt B there could be up to four regeneration harvests that will exceed maximum size limits, and that these will require Regional approval before a final decision. EA at 16, 112. It looks like under Alternative C there could be up to three regeneration harvest units that exceed the max limit. EA at 25. The EA points to Appendix C, Table 76, for specific information. EA at 18. But Table 76 does not state the acres involved for each unit, much less which of the units would exceed maximum limits for clearcut openings. Rather, it just states "clearcut." The EA also states that the 2018 Forest Plan allows maximum opening sizes up to 150 acres, but that the agency "will be announcing another 60-day public notice for up to four areas exceeding maximum opening size." EA at 224 (Appendix E).

The Forest Plan clearly states that maximum openings created by clearcutting, seedtree cutting, shelterwood seed cutting, or other cuts designed to regenerate an even-aged stand of timber in a single harvest operation shall be less than 40 acres. Exceptions to the 40-acre maximum opening size standard may occur when determined necessary to help achieve desired ecological conditions for the plan area. Yet nowhere in the EA does it disclose which units will exceed the Forest Plan's variable standard (FW_STD_TIMB-07) maximum opening size of 80 acres on warm-dry and warm moist, 150-acres on cool-moist, and 90-acres on cold potential vegetation types. The EA does not give a rationale for why this project cannot comply with the 40-acre maximum and requires a deviation from the Forest Plan exceptions. The EA does not let the public know how or who to comment to at the Regional Office.

Understanding which specific units will exceed the 40-acre threshold, where they are located, and what size they are proposed to be (i.e., over 150 acres?) is crucial to understanding the impacts of this proposal. In addition, the Forest Service failed to provide adequate notice of the proposal to include regeneration harvests that exceed maximum limits.

Furthermore, there is no analysis in the EA of how these large openings will impact wildlife, or whether they will impact fish or water quality, or scenic values. Without this site-specific information, the Forest Service is unable to take the required "hard look" at the impacts of its proposal and the public is unable to provide meaningful and informed public comment.

B. Consider climate change.

The Forest Service must consider and disclose the direct, indirect, and cumulative impacts of the proposed project on climate change, as well as the direct, indirect, and cumulative impacts of climate change on the proposed action. Climatic conditions, particularly extreme rainfall, snowmelt, and flooding, pose substantial risks to the infrastructure on and near the National Forests. *See* Six, D.L., et al., *Are Survivors Different? Genetic-Based Selection of Trees by Mountain Pine Beetle During a Climate Change-Driven Outbreak in a High-Elevation Pine Forest*, Front. Plant. Sci. 9:993, doi: 10.3389/fpls.2018.00993 (studying increased mortality of trees, driven directly or indirectly by climate change); Schoennagel, T., et al., *Adapt to more wildfire in western North American forests as climate changes*, PNAS (2017) Vol. 114 no. 18:4582-4590. These events result in damage or destruction of infrastructure and impacts to environmental resources. Rapid climate change is very likely to increase the size and frequency of these climatic stressors, increasing the hazards and risk to infrastructure, people, and ecosystems. These concerns are especially important given the project area includes the WUI, and as a result cumulative impacts from this project and climate change are likely to have devastating impacts to people living in or near the WUI.

The Forest Service must also consider and disclose the how changes in weather patterns due to climate change, including drought and extreme winds, play a major role in wildfire behavior and wildfire risk. Ignoring these factors ignores key relevant factors that affect the agency's claimed purpose and need.

C. Consider impacts from roads and motorized recreational use.

The best available science shows that roads cause significant adverse impacts to National Forest resources. See, e.g., 66 Fed. Reg. at 3208 ("Scientific evidence compiled to date [2001] suggests that roads are a significant source of erosion and sedimentation and are, in part, responsible for a decline

in the quality of fish and wildlife habitat.”). Guardians’ 2020 literature review that discloses the extensive and best available scientific literature—including the Forest Service’s General Technical Report synthesizing the scientific information on forest roads (Gucinski 2001)—on a wide range of road-related impacts to ecosystem processes and integrity on National Forest lands. *See* Attachment A. Erosion, compaction, and other alterations in forest geomorphology and hydrology associated with roads seriously impair water quality and aquatic species viability. Roads disturb and fragment wildlife habitat, altering species distribution, interfering with critical life functions such as feeding, breeding, and nesting, and resulting in loss of biodiversity. Roads facilitate increased human intrusion into sensitive areas, resulting in poaching of rare plants and animals, human-ignited wildfires, introduction of exotic species, and damage to archaeological resources.

Motorized recreational use also cases significant adverse impacts. *See* Attachment A. The Forest Service proposes to seasonally open 3.4 miles of FSR #9714 to motorized use, specifically to create a loop. Loops tend to be more enjoyable for recreational motorized use, as opposed to out-and-back rides. Adverse impacts from motorized recreational use are often felt more profoundly by non-motorized recreationists, whose attempt to seek solitude in the forest is disrupted by the noise of engines and dust.

Forest Roads, Human Access and Fire

Numerous factors drive instances of wildland fires and typically the Forest Service acknowledges topography, weather and fuel as the primary drivers but appears to assert that fuels are the only component that can be altered. The agency goes to great lengths attempting to demonstrate how vegetative treatments will change wildland fire behavior. But another major factor is human impacts. Human-ignited wildfires account for more than 90% of fires on national lands, and are five times more likely in areas with roads. Plus, roads can affect where and how forests burn and the vegetative condition of the forest. Yet despite the stated need to establish a resilient future forest, the Forest Service proposes to add 13.1 miles of roads to the system and use 5.3 miles of temporary roads without adequately demonstrating how it will enforce road closures. Given the amount of acres in the WUI and the stated need to reduce instances of wildland fires, the Forest Service must consider human-caused inginitions in an EIS.

Forest Roads and Climate Change

Climate change is a major challenge for natural resource managers because of the magnitude of potential effects and the related uncertainty of those effects. A robust analysis in an EIS of the forest road system and its environmental and social impacts is especially critical in the context of climate change.

Climate change intensifies the impacts associated with roads. For example, as the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience. Climate change is also expected to lead to more extreme weather events, resulting in increased flood severity, more frequent landslides, altered hydrographs, and changes in erosion and sedimentation rates and delivery processes. Many National Forest roads are poorly located and designed to be temporarily on the landscape, making them particularly vulnerable to these climate alterations. Even those designed for storms and water flows typical of past decades may fail under future weather scenarios, further exacerbating adverse ecological impacts, public safety concerns, and maintenance needs. At bottom, climate change

predictions affect all aspects of road management, including planning and prioritization, operations and maintenance, and design.

More broadly, the Forest Service has a mission to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations. Climate change science identified in the literature cited section of this comment demonstrates how climate change places ecosystems on our national forests at risk. Thus to fulfill its mission, the Forest Service must address the risks of climate change when managing road activities on our national forests.

Here, the Forest Service must analyze in detail the impact of climate change on forest roads and forest resources. It should start with a vulnerability assessment, to determine the project area's exposure and sensitivity to climate change, as well as its adaptive capacity. For example, the agency should consider the risk of increased disturbance due to climate change when analyzing this proposed project. It should include existing and reasonably foreseeable climate change impacts as part of the affected environment, assess them as part of the agency's hard look at impacts, and integrate them into each of the alternatives, including the no action alternative. The agency should also consider the cumulative impacts likely to result from the proposed project, proposed road activities, and climate change. In planning for climate change impacts and the proposed road activities, the Forest Service should consider: (1) protecting large, intact, natural landscapes and ecological processes; (2) identifying and protecting climate refugia that will provide for climate adaptation; and (3) maintaining and establishing ecological connectivity.

D. Impacts to wildlife and habitat.

The Forest Service must consider and disclose the direct, indirect, and cumulative impacts from this project to wildlife, including Canada lynx, grizzly bear, black bear, big game (including elk and elk habitat), moose, wolves, mountain lion, and bull trout. This includes impacts to grizzly bears outside of the denning period (Dec. 1 through March 31), and in particular impacts to female grizzly bears with cubs given the importance of reproduction to sustain a recovering NCDE population. The Forest Service improperly downplays impacts from roads to wildlife, including the impacts of road densities (even without motorized use) on grizzly bears and impacts of motorized use of roads and stream crossings on bull trout.

E. Impacts to water quality.

Consider and disclose the direct, indirect, and cumulative impacts of the proposed action to water quality and water quantity. It is well understood that forest roads (system and temporary) impact aquatic environments at multiple scales, and the more roads the greater the impact. The Forest Service must consider impacts, including those impacts from logging, fortifying or otherwise maintaining roads, and log truck hauling on forest roads to source drinking water. In analyzing the impacts to water quality and water quantity, the Forest Service must provide site-specific analysis of the location of riparian areas, water springs, fens, wetlands, etc., in the project area.

F. Cumulative impacts, including from Mid-Swan Project and Bug Creek Project.

The Forest Service must consider and disclose cumulative impacts, including the reasonably foreseeable impacts that will result from the Mid-Swan Project and Bug Creek Project.

G. Impacts to the Wildland Urban Interface, and impacts from increased development of the Wildland Urban Interface.

The Forest Service should consider and disclose the growing issue of human development within the WUI. *See* H. Powell, *Old Flames: The Tangled History of Forest Fires, Wildlife, and People*, *available at* https://www.allaboutbirds.org/old-flames-the-tangled-history-of-forest-fires-wildlife-and-people/, All About Birds (last accessed July 2, 2019) ("More than 12.7 million new homes went up in this 'wildland-urban interface' just between 1990 and 2010"). The Forest Service should also disclose any agency efforts to develop wildfire preparedness with homeowners within the WUI within this project area, as opposed to the myopic focus on cutting trees. Actions that develop wildfire preparedness with homeowners within the WUI would achieve the stated goals of reducing fire behavior near WUI communities and for safer wildland fire operations.

H. Travel Analysis: Identify the minimum road system and identify more road miles to decommission.

The Forest Service should consider any forest-level and project-level travel analysis reports, identify the minimum road system, and identify unneeded roads to prioritize for decommissioning or other uses. The Forest Service faces many challenges with its oversized, under-maintained, and unaffordable road system. The Flathead National Forest is no exception, with over 3,500 miles of system roads, the required maintenance of which exceeds annual maintenance costs. *See* Final Travel Analysis Report for Flathead National Forest (Dec. 30, 2014), p. 20 (noting "The Flathead NF currently receives approximately 42 percent of the funds needed to maintain the road system to standard."). Only 27 percent of the system roads are managed for passenger vehicles, providing forest access to the public. *Id.* at 4. What's more, the impacts from roads to water, fish, wildlife, and ecosystems are tremendous and well documented in scientific literature.

To address its unsustainable and deteriorating road system, the Forest Service promulgated the Roads Rule (referred to as "subpart A" of the Travel Management Rule) in 2001. 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A. Subpart A is meant to close the gap between the agency's limited resources and the maintenance required to keep up its oversized and deteriorating road system. It sets out two important obligations for the agency:

(1) Identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of National Forest system lands; and
(2) Identify unneeded roads to prioritize for decommissioning or to be considered for other uses.

36 C.F.R. § 212.5(b).

We urge the Forest Service to carefully evaluate the Bug Creek Project and each of the alternatives through this lens and incorporate into an EIS the need to identify and implement a minimum road system. Under subpart A, the Forest Service has a substantive duty to address its over-sized road system. See 36 C.F.R. § 212.5. Identifying a resilient future road system is one of the most important endeavors the Forest Service can undertake to restore aquatic systems and wildlife habitat, facilitate adaptation to climate change, ensure reliable recreational access, and operate within budgetary constraints. This underlying substantive duty must inform the scope of, and be included in, the

agency's NEPA analysis. After nearly 20 years since finalizing the subpart A rules, the Forest Service can no longer delay in addressing this duty.

Direction from the Forest Service's Washington Office required all forests to submit travel analysis reports by the end of FY 2015 and then begin implementing the recommendations and working towards full compliance with subpart A.[1] We applaud the Flathead National Forest for finalizing its travel analysis report. Even more important, however, is the next step under subpart A: Consider the recommendations and science-based analysis in the travel analysis report as it applies to the project area to identify the minimum road system[2] and identify unneeded roads for decommissioning. Given that with this project you are considering changes to the status of certain roads, and given its focus on establishing a resilient forest landscape, this is precisely the type of project to complete the next steps under subpart A.[3]

To identify the minimum road system, the Forest Service must consider whether each road segment the agency decides to maintain on the system is needed to meet certain factors outlined in the agency's own regulation.[4] Consider whether each road segment is needed to:

(1) Meet resource and other management objectives adopted in the relevant land and resource management plan;
(2) Meet applicable statutory and regulatory requirements;
(3) Reflect long-term funding expectations; and
(4) Ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

36 C.F.R. § 212.5(b)(1).

The Forest Service proposes to add 13.1 miles of new system roads to the forest's transportation system, and construct and use 5.3 miles of temporary roads. Adding miles to an already-over-sized road system runs contrary to Forest Service policy, especially where these roads will hinder the recovery of threatened grizzly bears and threatened bull trout, and where the agency has failed to demonstrate how expanding the road system will protect NFS lands or reflect long-term funding expectations.

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[1] *See* Memorandum from Leslie Weldon to Regional Foresters *et al.* on Travel Management, Implementation of 36 CFR, Part 212, Subpart A (March 29, 2012). *See also* 66 Fed. Reg. at 3215 (explaining the 2001 "final rule requires that the agency use a roads analysis prior to making decisions about road construction, reconstruction, and decommissioning.").
[2] 36 C.F.R. § 212.5(b)(1) ("In determining the minimum road system, the responsible official must incorporate a science-based road analysis at the appropriate scale").
[3] 2012 Weldon Memo ("The next step in identification of the [minimum road system] is to use the travel analysis report to develop proposed actions to identify the [minimum road system]. These proposed actions generally should be developed at the scale of a 6th code subwatershed or larger.").
[4] *Id.* ("analyze the proposed action and alternatives in terms of whether, per 36 CFR 212.5(b)(1), the resulting [road] system is needed"); ("The resulting decision [in a site-specific project] identifies the [minimum road system] and unneeded roads for each subwatershed or larger scale").

In assessing each of the specific road segments within the project area, the Forest Service should disclose the risks and benefits of each road as analyzed in the travel analysis reports, and whether the proposed road management measures are consistent with the recommendations while noting changes and the supporting rationale between the 2014 forest-wide TAR and any project-specific TAR. To the extent that the proposed action here differs from what is recommended in the Flathead's TAR, the Forest Service must explain that inconsistency. *See, e.g.*, *Smiley v. Citibank*, 517 U.S. 735 (1996) ("Sudden and unexplained change . . . or change that does not take account of legitimate reliance on prior interpretation . . . may be 'arbitrary, capricious [or] an abuse of discretion") (internal citations omitted).

In the very least, if the Forest Service decides not to identify the minimum road system for this project area, it must respond to this to explain why not.

In addition, the Forest Service must identify unneeded roads for decommissioning or other uses. 36 C.F.R. § 212.5(b)(2).[5] Here, the Forest Service proposes two miles of road for decommissioning. Based on current natural resource conditions, assessed risks from the existing road network, road densities across the landscape, the agency's limited resources, long-term funding expectations, and the agency's policy against adding miles to the road system, a net reduction to the system road miles in the project area through road decommissioning is warranted. Road decommissioning can temporarily increase sediment to streams, but results in dramatic reductions in the long run. The Forest Service's Rocky Mountain Research Station has spent over a decade monitoring the effectiveness of road treatments. A 2012 report evaluating pre and post treatment of roads showed an 80% reduction in sediment delivery to streams when roads were properly decommissioned.[6] Decommissioning more road miles is consistent with the Forest Service's long-standing policy to "manag[e] access within the capability of the land."[7]

Subpart A of the Forest Service's own Travel Management Rule requires it to identify unneeded roads to prioritize for decommissioning or to be considered for other uses. 36 C.F.R. § 212.5(b)(2). *See also Center for Sierra Nevada v. U.S. Forest Service*, 832 F. Supp. 2d 1138, 1155 (E.D. Cal. 2011) ("The court agrees that during the Subpart A analysis the Forest Service will need to evaluate all roads, including any roads previously designated as open under subpart B, for decommissioning."). A decision to decommission roads should also consider and disclose recommendations from the travel analysis reports. 36 C.F.R. § 212.5(b)(2) (requiring decisions about which roads are needed to be based on "a science-based roads analysis at the appropriate scale."). As such, we urge the Forest Service to include decommissioning unneeded roads as part of this project's purpose in fulfillment of subpart A compliance.

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[5] 36 C.F.R. § 212.1 (defining a road as "[a] motor vehicle travelway over 50 inches wide, unless designated and managed as a trail.").
[6] Nelson N., Black T., Luce C. and R. Cissel, U.S. Forest Service Rocky Mountain Research Station, LRT Monitoring Project Update 2012.
[7] 66 Fed. Reg. at 3208, 3215 (highlighting in 2001 that the Forest Service was "shifting from developing new roads" and increasing "emphasis on maintaining existing roads and improving access in other areas.")

VI. Consider a range of alternatives under NEPA.

The Forest Service must consider a reasonable range of alternatives, including an alternative that considers decommissioning more system roads to maintain and improve terrestrial wildlife species habitat and security. This alternative would not detract from the agency's stated purposes, and in fact adds to achieving those goals including reducing fire behavior in the WUI and improving diversity and resilience of vegetation on the forest. The Forest Service should consider a reasonable alternative that does not include the addition of 13.1 miles of system roads. These could easily be proposed as temporary roads instead of being added to an over-sized, under-funded road system. The Forest Service should consider a reasonable alternative that does not include 5.3 miles of temporary roads. In addition, the Forest Service should consider an alternative that includes identifying a minimum road system as required by the TMR subpart A.

VII. Demonstrate compliance with the National Forest Management Act.

Under the National Forest Management Act ("NFMA"), specific projects like this must be consistent with the governing forest plan. 16 U.S.C. § 1604(i). The Forest Service must demonstrate how the proposed actions are consistent with the 2018 Flathead Forest Plan and 2012 planning rules. Specifically, the Forest Service must explain how this project will meet the access management plan components adopted to protect grizzly bears, including road density and secure core requirements as well as spatial and temporal requirements.

The Forest Service must explain how these actions will maintain or restore the structure, function, composition, and connectivity to contribute to the recovery of the NCDE grizzly bear population, Canada lynx, and bull trout. It should explain how its proposal, including the plans to build new system roads, construct temporary roads, and authorize log hauling on numerous forest roads, will contribute to the survival and recovery of grizzly bear, Canada lynx, and bull trout.

Specifically, regarding access management plan components and grizzly bears, the Forest Service fails to demonstrate how the project will comply with the 2018 Forest Plan. As one example, the Forest Service proposes Bug Creek for ten years. EA at 135. This, despite Forest Plan Guideline FW-GDL-IFS-01 stating that projects should be designed so that on-the-ground implementation does not exceed 5 years. Any attempt by the Forest Service to claim that this Bug Creek "Project" is not a "project" under the agency's plan components defining a "project" within the NCDE PCA as any activity is unreasonable, plainly erroneous in light of the plain language and plain understanding of the term project, and arbitrary and capricious.

As another example, the Forest Service fails to demonstrate how the project will comply with access management plan components, including FW-STD-IFS-04 (limiting temporary use of restricted roads to 30 consecutive days). This project would be entirely within Crane Mountain Grizzly Bear Subunit ("GBSU") and some restricted roads used for access and log hauling would be in the Porcupine Woodward GBSU, both within the NCDE Primary Conservation Area ("PCA"). EA at 134-135. The project includes use of restricted roads. EA at 140. The Forest Service appears to downplay the impacts of these uses by focusing on whether the restricted roads in the project area affect denning habitat; but the Forest Plan component limiting use of restricted roads is not cabined to restricted roads within denning habitat.

Table 60 purports to show the "baseline situation" for OMRD, TMRD, and secure core in the project GBSUs. EA at 137. It shows Crane Mountain at 28% OMRD, 55% TMRD, and 25% secure core. It shows Porcupine Woodward at 28% OMRD, 75% TMRD, and 15% secure core. But the agency fails to demonstrate how the project will comply with the forest plan components including FW-STD-IFS-02 (requiring no net decrease to secure core and no net increase to road densities from baseline) and FW-STD-IFS-03 (allowing "temporary changes" to road density and secure core), other than to defer that demonstration to project implementation. *See, e.g.*, EA at 138 ("Calculations *will include* estimated changes for each year of the anticipated duration of the project and *will be* incorporated into the 10-year running average") (emphasis added).

The Forest Service notes that assumptions for the road density calculations and explanation for how the roads are counted for OMRD, TMRD, and secure core are in project file exhibit L-04, but this is not available as part of the publicly available EA. EA at 142-143. Because the project will be authorized for ten years, the assumptions and specifics about how the Forest Service calculated the numbers in Table 61 are crucial to understanding limits on this project. For example, based solely on the information in the EA it is impossible to determine whether the agency's assumptions are based on design criteria or other non-discretionary requirements to ensure the calculations shown in Table 61 are accurate. If the assumptions include reliance on the proposed temporary gate on NFS road 498 to omit 4.1 miles of existing open road from the road density and secure core calculations, that reliance is misplaced and as a result the Table 61 calculations are likely inaccurate. At bottom, the failure to disclose the basis for the agency's assumptions precludes meaningful public comment, and fails to demonstrate compliance with the Forest Plan.

The Forest Service also fails to demonstrate how this project will comply with Guideline FW-GDL-IFS-02, directing the agency to restore secure core, OMRD, and TMRD to pre-project levels within one year after completion of the project.

It is also impossible to understand how the Forest Service is interpreting the Forest Plan components as applied to this project, which is proposed for a period of 10 years. For example:

- How does the agency treat a 10-year project in relation to the 10-year running average for no-net-change to road density or secure core?

- How does the agency interpret "temporary change" for a project proposed to last 10 years?

- What is the difference between a "temporary road" (i.e., the 5.3 miles of temporary road proposed herein) and a system road (13.1 miles proposed herein) that is proposed within grizzly bear NCDE PCA, in light of Guideline FW-GDL-IFS-02 direction to restore secure core, OMRD, and TMRD to pre-project levels within one year after completion of the project and Guideline FW-GDL-IFS-01 direction that on-the-ground implementation not exceed 5 years?

We request the Forest Service answer these questions in addition to providing the information necessary to understanding the assumptions and methods for calculating road density and secure core within the GBSUs.

VIII. Demonstrate compliance with the Endangered Species Act.

The Forest Service has an independent duty to ensure this proposed action complies with the Endangered Species Act ("ESA"). The project area on the Flathead National Forest provides habitat for species listed under the ESA, including threatened bull trout and its designated critical habitat, threatened grizzly bear, and Canada lynx and its designated critical habitat. Section 7 of the ESA imposes a substantive obligation on federal agencies to "insure that any action authorized, funded, or carried out by such agency . . . is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of" habitat that has been designated as critical for the species. 16 U.S.C. § 1536(a)(2). The Forest Service fails to demonstrate how the project will ensure the survival and recovery of bull trout, grizzly bear, or Canada lynx in the project area.

As just one example, the Forest Service admits that both the proposed action and alternative would include up to 12 stream crossings, as well as culvert work to reduce culvert failure risk. The agency also acknowledges that sediment delivery is the principle measure affecting water quality, aquatic habitat, and stream morphology, and sediment sources for this project are almost entirely associated with stream crossing improvements.[8] EA at 51. Yet the agency ignores the adverse impacts from these stream crossings to water quality, bull trout habitat (including critical habitat), and ultimately bull trout. It improperly downplays the short-term adverse effects from culvert work, instead focusing on long-term benefits despite the proposed ongoing log truck hauling that will increase use of the forest roads, and thus the stream crossings. The Forest Service ignores these effects, when considered in the cumulative with effects from the Mid-Swan Project to local bull trout populations and habitat, in addition to ongoing threats from competition and predation by non-native lake trout and angler catch mortality, as well as impacts from climate change that may increase culvert failure risk despite the proposed improvements.

The Forest Service states that the short-term effects would not overlap with mapped bull trout critical spawning and rearing habitat. EA at 42. But as noted above in section III, any maps showing how the project overlaps (or doesn't) with designated bull trout critical habitat are not disclosed to the public but rather incorporated by reference. Because the Swan River and Swan Lake are designated bull trout critical habitat, EA at 43, the Forest Service should explain how this project, including any tributaries to these waters, relates to those waters. Log hauling on forest roads that cross streams that are tributaries to bull trout critical habitat may affect bull trout and its critical habitat, in part by reducing water quality, and thus warrant consultation.

As one more example, the Forest Service fails to explain how the project will comply with the ESA despite the proposed clearcuts (including up to four that will result in openings that exceed maximum limits in the Forest Plan). Lynx avoid areas that have been clearcut, logged, and even thinned. *See* Squires, John *et al.*, *Seasonal Resource Selection of Canada Lynx in Managed Forests of the Northern Rocky Mountains*, 74 J. of Wildlife Mgmt. 1648-1660 (2010), pages 1656-1657 ("Forests that were thinned as a silvicultural treatment were generally avoided by lynx"). The Forest Service should consider differences in lynx use of certain habitat types in different seasons, especially since ensuring

[8] The Forest Service improperly ignores the sediment delivery impacts that will result from heavy machinery and equipment use (including log haul trucks) of the forest roads, including at stream crossings.

winter habitat is the most important for lynx. Maintaining and recruiting lynx winter habitat – as opposed to focusing on winter hare habitat – is most important to conserve lynx, especially in the winter when the species is most taxed. *Id.* ("winter is the most constraining season for lynx in terms of resource use"). Reduction in horizontal cover degrades the quality of winter habitat for lynx. *Id.*

The Forest Service should discuss and analyze how the project – including increased use of forest roads for truck hauling and accessing forest trails – would affect lynx movement though the project area. This should include analysis of impacts to both official linkage areas as well as other known travel corridors in the project area.

As a final example, the Forest Service proposes to increase the miles of roads on the landscape despite the project area already not meeting thresholds for secure core that have been determined necessary for the survival and recovery of grizzly bears. The Bug Creek Project will harm grizzly bears by increasing human-caused grizzly mortality and the risk for these mortalities, increasing bears' habituation to humans, limiting grizzlies' use of habitat, and disturbing bears' normal feeding, breeding, and sheltering activities.

Importantly, we encourage the Forest Service to be transparent about the consultation process and affirmatively post all consultation documents, including any Forest Service Biological Evaluations or Assessments, any letters seeking concurrence, and any responses or Biological Opinions from the Fish and Wildlife Service ("FWS"). The Forest Service states that it will complete consultation with FWS for Canada lynx and grizzly before the decision is finalized, but fails to provide any of the documents to demonstrate compliance with the ESA. Without these records, we are unable to assess the agency's analysis of impacts to wildlife in light of FWS's expert opinion. Providing this information will allow the public to view these critical documents, and other documents in the project record, without the need to submit a formal Freedom of Information Act request. Without this information being publicly available during the notice and comment period, we are unable to meaningfully comment on the agencies' determinations or analysis.

The Forest Service does not mention future ESA consultation to assess the impacts of Bug Creek to bull trout. To the extent the Forest Service claims this project will have "no effect" on these listed species or designated critical habitat, that determination is arbitrary and capricious because, *inter alia*, it fails to consider key factors, ignores best available science, and is not supported by the record. In the very least, the Forest Service should initiate consultation with FWS to assess in detail the potential effects to all listed species and designated critical habitat that may be present in the project area.

IX. Demonstrate compliance with the Clean Water Act.

Under the Clean Water Act ("CWA"), states are responsible for developing water quality standards to protect the desired conditions of each waterway within the state's regulatory jurisdiction. 33 U.S.C. § 1313(c). Water bodies that fail to meet water quality standards are deemed "water quality-limited" and placed on the CWA's § 303(d) list. The CWA requires all federal agencies to comply with water quality standards, including a state's anti-degradation policy. 33 U.S.C. § 1323(a). The Forest Service must ensure all activities in this proposal comply with the CWA. In particular, it must ensure its proposal for logging, and the associated road reconstruction, maintenance, and ongoing log hauling other uses of these roads, will not cause or contribute to a violation of water quality standards. The Forest Service's analysis for the Bug Creek Project fails to ensure compliance with

the CWA, primarily due to its reliance on BMPs to ensure mitigate sedimentation without demonstrating their effectiveness under changing climatic conditions, as we described above. Not only will the proposed action contribute sediment to water quality limited streams, it will also degrade existing water quality in violation of antidegradation rules.

Conclusion

The Forest Service's current road system is over-sized and unaffordable. Identifying a sustainable future road system is one of the most important endeavors the Forest Service can undertake to restore aquatic systems and wildlife habitat, facilitate adaptation to climate change, enhance recreation, work towards a more resilient future landscape, and lower operating expenses. We urge the Forest Service to properly analyze the environmental consequences of forest roads in an EIS, and include identification of a minimum road system as one of the purposes of the project.

Sincerely,

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Attachments

Attachment A: WildEarth Guardians, The Environmental Consequences of Forest Roads and Achieving a Sustainable Road System, March 2020.

Attachment B: H. Powell, Old Flames: The Tangled History of Forest Fires, Wildlife, and People, available at https://www.allaboutbirds.org/old-flames-the-tangled-history-of-forest-fires-wildlife-and-people, All About Birds (last accessed December 10, 2020).

Attachment C: ProPublica, 2020 "Despite What the Logging Industry Says, Cutting Down Trees Isn't Stopping Catastrophic Wildfires." Mountain Town News, 2020 "Colorado's Troublesome megafire."

Attachment D: Best, Colorado's Troublesome megafire, Nov. 2020 article in Mountain Town News.

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ATTACHMENT D

WildEarth GUARDIANS
A FORCE FOR NATURE

The Environmental Consequences of Forest Roads and Achieving a Sustainable Road System

March 2020

ATTACHMENT D

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Acknowledgements: We thank The Wilderness Society for the report titled, *Transportation Infrastructure and Access on National Forests and Grasslands: A Literature Review. May 2014.* This paper updates and revises the original report adding 59 additional citations, and featuring several new sections. We also thank Adam Switalski, Principal of InRoads Consulting, LLC for the bulk of this report's research and technical writing.

Cover photos credits: Mt. Baker-Snoqualmie National Forest, 2016. WildEarth Guardians.

Introduction

The Forest Service faces many challenges with its vastly oversized, under-maintained, and unaffordable transportation system. With 370,643 miles of system roads and 137,409 miles of system trails (USDA Forest Service 2019), the network extends broadly across every national forest and grassland and through a variety of habitats, ecosystems and terrains. An impressive body of scientific literature addresses the various effects of roads on the physical, biological and cultural environment. Numerous studies demonstrate the harmful environmental consequences to water, fish, wildlife, and ecosystems.

In recent years, the scientific literature has expanded to address the effects of roads on climate change adaptation and conversely the effects of climate change on roads, as well as the multiple benefits of road removal on the physical, biological and cultural environments.

The first section of this paper provides a literature review summarizing the most recent science related to the environmental impacts of forest roads and motorized trails. The second section focuses on climate change effects and strategies to address the growing ecological consequences to forest resources. The third section provides background and specific direction for the Forest Service to provide for an ecologically and economically sustainable road system, including recommendations for future action.

I. Impacts of Transportation Infrastructure and Access to the Ecological Integrity of Terrestrial and Aquatic Ecosystems and Watersheds

It is well understood that transportation infrastructure provides access to national forests and grasslands and also harms aquatic and terrestrial environments at multiple scales. In general, the more roads and motorized trails the greater the impacts. Since its emergence, the field of road ecology and the resulting research has proven the magnitude and breadth of ecological issues related to roads; entire books have been written on the topic (e.g., Forman et al. 2003, van der Ree et al. 2015), and research centers continue to expand their case studies, including the Western Transportation Institute at Montana State University and the Road Ecology Center at the University of California - Davis.[1]

Below, we provide a summary of the current understanding of the impacts of roads and motorized access on terrestrial and aquatic ecosystems, supplementing long-established, peer-reviewed literature reviews on the topic, including Gucinski et al. (2000), Trombulak and Frissell (2000), Coffin (2007), and Robinson et al. (2010). More targeted reviews have been published on the effects of roads on insects (Munoz et al. 2015), vertebrates (da Rosa 2013), and animal abundance (Fahrig and Rytwinski 2009, Benítez-López et al. 2010). Literature reviews on the ecological and social impacts of motorized recreation include Gaines et al. (2003), Davenport and Switalski (2006), Ouren

[1] See http://www.westerntransportationinstitute.org/programs/road-ecology and http://roadecology.ucdavis.edu/

et al. (2007), Switalski and Jones (2012), and, more recently, Switalski (2017). In addition to the physical and environmental impacts of roads, increased visitation has resulted in intentional and unintentional damage to many cultural and historic sites (Spangler and Yentsch 2008, Sampson 2009, Hedquist et al. 2014).

A. Impacts on geomorphology and hydrology

The construction and presence of forest roads can dramatically change the hydrology and geomorphology of a forest system leading to reductions in the quantity and quality of aquatic habitat (Al-Chokhachy et al. 2016). While there are several mechanisms that cause these impacts (Wemple et al. 2001, Figure 1), most fundamentally, compacted roadbeds reduce rainfall infiltration, intercepting and concentrating water, and providing a ready source of sediment for transport (Wemple et al. 2001). In fact, roads contribute more sediment to streams than any other land management activities on Forest Service lands (Gucinski et al. 2000). Surface erosion rates from roads can be up to three orders of magnitude greater than erosion rates from undisturbed forest soils (Endicott 2008).

Erosion and sediment produced from roads occur both chronically and catastrophically. Every time it rains, sediment from the road surface and from cut-and fill-slopes is picked up by rainwater that flows into and on roads (fluvial erosion). The sediment that is entrained in surface flows are often concentrated into road ditches and culverts and directed into streams. The degree of fluvial erosion varies by geology and geography, and increases with increased motorized use (Robichaud et al. 2010). Closed roads produce significantly less sediment than open drivable roads (Sosa Pérez and Macdonald 2017, Foltz et al. 2009).

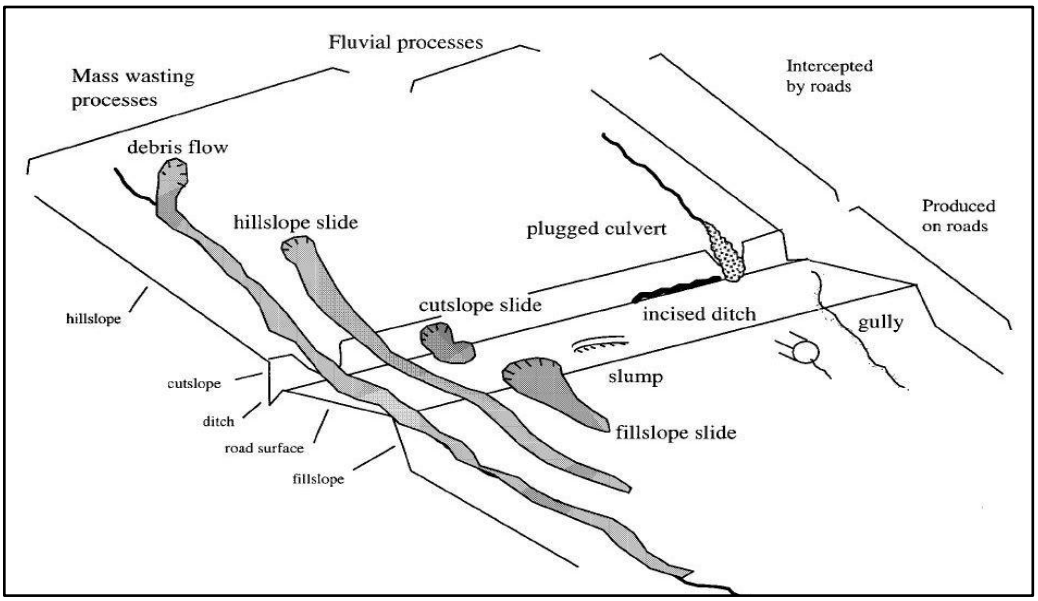

Figure 1: Typology of erosional and depositional features produced by mass-wasting and fluvial processes associated with forest roads (reprinted from Wemple et al. 2001).

Roads also precipitate catastrophic failures of road beds and fills (mass wasting) during large storm events leading to massive slugs of sediment moving into waterways (Gucinski et al. 2000, Endicott 2008). This typically occurs when culverts are undersized and cannot handle the volume of water funneled through them, or they simply become plugged with debris and sediment. The saturated roadbed can fail entirely and result in a landslide, or the blocked stream crossing can erode the entire fill down to the original stream channel.

The erosion of road- and trail-related sediment and its subsequent movement into stream systems affects the geomorphology of the drainage system in a number of ways. It directly alters channel morphology by embedding larger gravels as well as filling pools. It can also have the opposite effect of increasing peak discharges and scouring channels, which can lead to disconnection of the channel and floodplain, and lowered base flows (Gucinski et al. 2000). The width/depth ratio of the stream changes can trigger changes in water temperature, sinuosity and other geomorphic factors important for aquatic species survival (Trombulak and Frissell 2000).

B. Impacts on aquatic habitat and fish

Roads can have dramatic and lasting impacts on fish and aquatic habitat. Increased sedimentation in stream beds has been linked to decreased fry emergence, decreased juvenile densities, loss of winter carrying capacity, increased predation of fish, and reductions in macro-invertebrate populations that are a food source to many fish species (Gucinski et al. 2000, Endicott 2008). Roads close to streams reduce the number of trees available for large wood recruitment, and reduce stream-side shade (Meredith et al. 2014.) On a landscape scale, these effects add up to: changes in the frequency, timing and magnitude of disturbance to aquatic habitat and changes to aquatic habitat structures (e.g., pools, riffles, spawning gravels and in-channel debris), and conditions (food sources, refugia, and water temperature; Gucinski et al. 2000).

River fragmentation

Roads also act as barriers to migration and fragment habitat of aquatic species (Gucinski et al. 2000). Where roads cross streams, road engineers usually place culverts or bridges. Undersized culverts interfere with sediment transport and channel processes such that the road/stream crossing becomes a barrier for fish and aquatic species movement up and down stream (Erikinaro et al. 2017). For instance, a culvert may scour on the downstream side of the crossing, actually forming a waterfall up which fish cannot move. Undersized culverts can infringe upon the channel or floodplain and trap sediment causing the stream to become too shallow and/or warm such that fish will not migrate past the structure. Or, the water can move through the culvert at too high a gradient or velocity to allow fish passage (Endicott 2008).

River fragmentation is problematic for many aquatic species but especially for anadromous species that must migrate upstream to spawn. Well-known native aquatic species affected by roads include salmon such as coho (*Oncorhynchus kisutch*), Chinook (*O. tshawytscha*), and chum (*O. keta*); steelhead

(*O. mykiss*), a variety of trout species including bull trout (*Salvelinus confluentus*) and cutthroat trout (*O. clarki*), as well as other native fish and amphibians (Endicott 2008). The restoration and mitigation of impassable road culverts has been found to restore connectivity and increase available aquatic habitat (Erikinaro et al. 2017), and the quality of aquatic habitat (McCaffery et al. 2007).

C. Impacts on terrestrial habitat and wildlife

Roads and trails impact wildlife through a number of mechanisms including: direct mortality (poaching, hunting/trapping), changes in movement and habitat-use patterns (disturbance/avoidance), as well as indirect impacts including altering adjacent habitat and interference with predator/prey relationships (Coffin 2007, Fahrig and Rytwinski 2009, Robinson et al. 2010, da Rosa and Bager 2013). Some of these impacts result from the road itself, and some result from the uses on and around the roads (access). Ultimately, numerous studies show that roads reduce the abundance, diversity, and distribution of several forest species (Fayrig and Ritwinski 2009, Benítez-López et al. 2010, Munoz et al. 2015).

Abundance and distribution

The extensive research on roads and wildlife establish clear trends of wildlife population declines. Fahrig and Rytwinski (2009) reviewed the empirical literature on the effects of roads and traffic on animal abundance and distribution looking at 79 studies that addressed 131 species. They found that the number of documented negative effects of roads on animal abundance outnumbered the number of positive effects by a factor of 5. Amphibians, reptiles, and most birds tended to show negative effects. Small mammals generally showed either positive effects or no effect, mid-sized mammals showed either negative effects or no effect, and large mammals showed predominantly negative effects. Benítez-López et al. (2010) conducted a meta-analysis on the effects of roads and infrastructure proximity on mammal and bird populations. They found a significant pattern of avoidance and a reduction in bird and mammal populations in the vicinity of infrastructure. Muñoz et al. (2015) found that many insect populations have declined as well.

Direct mortality, disturbance, and habitat modification

Road and motorized trail use affect many different types of species. For example, trapping, poaching, collisions, negative human interactions, disturbance and displacement significantly impact wide ranging carnivores (Gaines et al. 2003, Table 1). Hunted game species such as elk (Cervus canadensis), become more vulnerable from access allowed by roads and motorized trails resulting in a reduction in effective habitat among other impacts (Rowland et al. 2005). Slow-moving migratory animals such as amphibians, and reptiles who use roads to regulate temperature, are also vulnerable (Gucinski et al. 2000, Brehme et al. 2013). Roads and motorized trails also affect ecosystems and habitats because they are major vectors of non-native plant and animal species (Gelbard and Harrison 2003). This can have significant ecological and economic impacts when aggressive invading species overwhelm or significantly alter native species and systems.

Table 1: Road- and recreation trail-associated factors for wide-ranging carnivores (Reprinted from Gaines et al. (2003)[2]

Focal species	Road-associated factors	Motorized trail-associated factors	Nonmotorized trail-associated factors
Grizzly bear	Poaching Collisions Negative human interactions Displacement or avoidance	Poaching Negative human interactions Displacement or avoidance	Poaching Negative human interactions Displacement or avoidance
Lynx	Down log reduction Trapping Collisions Disturbance at a specific site	Disturbance at a specific site Trapping	Disturbance at a specific site
Gray wolf	Trapping Poaching Collisions Negative human interactions Disturbance at a specific site Displacement or avoidance	Trapping Disturbance at a specific site	Trapping Disturbance at a specific site
Wolverine	Down log reduction Trapping Disturbance at a specific site Collisions	Trapping Disturbance at a specific site	Trapping Disturbance at a specific site

Habitat fragmentation

At the landscape scale, roads fragment habitat blocks into smaller patches that may not be able to support interior forest species. Smaller habitat patches result in diminished genetic variability, increased inbreeding, and at times local extinctions (Gucinski et al. 2000; Trombulak and Frissell 2000). For example, a narrow forest road with little traffic was a barrier in Arizona to the Mt. Graham red squirrel (*Tamiasciurus hudsonicus grahamensis*; Chen and Koprowski 2013). Fragmentation intensifies concerns about grizzly bear population viability, especially since roads increase human/bear interactions exacerbating the problem of excessive mortality (Proctor et al, 2012)

Roads also change the composition and structure of ecosystems along buffer zones, called edge-affected zones. The width of edge-affected zones varies by what metric is being discussed; however, researchers have documented road-avoidance zones a kilometer or more away from a road (Robinson et al.2010; Table 2). In heavily roaded landscapes, edge-affected acres can be a significant percentage of total acres. For example, in a landscape where the road density is 3 mi/mi^2 and where the edge-affected zone is estimated to be 500 ft from the center of the road to each side, the edge-affected zone is 56% of the total acreage.

[2] For a list of citations see Gaines et al. (2003).

Table 2: A summary of some documented road-avoidance zones for various species (adapted from Robinson et al. 2010).

Species	Avoidance zone m (ft)	Type of disturbance	Reference
Snakes	650 (2133)	Forestry roads	Bowles (1997)
Salamander	35 (115)	Narrow forestry road, light traffic	Semlitsch (2003)
Woodland birds	150 (492)	Unpaved roads	Ortega and Capen (2002)
Spotted owl	400 (1312)	Forestry roads, light traffic	Wasser et al. (1997)
Marten	<100 (<328)	Any forest opening	Hargis et al. (1999)
Elk	500–1000 (1640-3281)	Logging roads, light traffic	Edge and Marcum (1985)
Grizzly bear	3000 (9840)	Fall	Mattson et al. (1996)
	500 (1640)	Spring and summer	
	1122 (3681)	Open road	Kasworm and Manley (1990)
	665 (2182)	Closed road	
Black bear	274 (899)	Spring, unpaved roads	Kasworm and Manley (1990)
	914 (2999)	Fall, unpaved roads	

Migration disruption

Roads disrupt migration of large ungulates, such as elk, impeding travel at multiple scales, including seasonal home range use and migration to winter range (Buchanan et al. 2014, Prokopenko et al. 2017). For example, a recent study found migrating elk changed their behavior and stopover use on migration routes that were roaded (Paton et al. 2017). The authors suggest this disturbance may lead to decreased foraging, displacement of high-quality habitat, and affect the permeability of the migration route. In addition, roads disrupt grizzly bear movements influencing dispersal away from the maternal home range and ultimately influencing population-level fragmentation." (Proctor et al. 2018).

Oil and gas development (and associated roads) reduced the effectiveness of both mule deer and pronghorn migration corridors in western Wyoming. (Sawyer et al. 2005). Multiple studies found that mule deer increased their rate of travel during migrations, reducing stop over time and their use of important foraging habitats (Sawyer et al. 2012, Lendrum et al. 2012; Ledrum et al. 2013;). A study in Colorado found that female mule deer changed their migration timing which may change alignment with vegetative phenology and potentially result in energetic and demographic costs (Lendrum et al. 2013).

D. Road density thresholds for fish and wildlife[3]

It is well documented that, beyond specific road density thresholds, certain species will be negatively affected, and some risk being extirpated (Robinson et al. 2000, Table 3). Most studies that look into the relationship between road density and wildlife focus on the impacts to large endangered carnivores or hunted game species, although high road densities certainly affect other species. Grizzly bears have been found to have a higher mortality risk as road density increases (Boulanger and Stenhouse 2014). Gray wolves (*Canis lupus*) in the Great Lakes region and elk in Montana and Idaho also face increased mortality risk, and have undergone the most long-term and in-depth analysis. Forman and Hersperger (1996) found that in order to maintain a naturally functioning landscape with sustained populations of large mammals, road density must be below 0.6 km/km^2 (1.0 mi/mi^2).

A number of studies show that higher road densities also impact aquatic habitats and fish (Table 3). Carnefix and Frissell (2009) provide a concise review of studies that correlate cold water fish abundance and road density, and from the cited evidence concluded that:

> 1) no truly "safe" threshold road density exists, but rather negative impacts begin to accrue and be expressed with incursion of the very first road segment; and 2) highly significant impacts (e.g., threat of extirpation of sensitive species) are already apparent at road densities on the order of 0.6 km/km^2 (1.0 mi/mi^2) or less, (Carnefix and Frissell (2009), p. 1).

Cold water salmonids such as threatened bull trout, are particularly sensitive to the impacts of forest roads. The U.S. Fish and Wildlife Service's Final Rule listing bull trout as threatened (USDI Fish and Wildlife Service 1999) addressed road density stating:

> … assessment of the interior Columbia Basin ecosystem revealed that increasing road densities were associated with declines in four non-anadromous salmonid species (bull trout, Yellowstone cutthroat trout, westslope cutthroat trout, and redband trout) within the Columbia River Basin, likely through a variety of factors associated with roads (Quigley & Arbelbide 1997). Bull trout were less likely to use highly roaded basins for spawning and rearing, and if present, were likely to be at lower population levels (Quigley and Arbelbide 1997). Quigley et al. (1996) demonstrated that when average road densities were between 0.4 to 1.1 km/km^2 (0.7 and 1.7 mi/mi^2) on USFS lands, the proportion of subwatersheds supporting "strong" populations of key salmonids dropped substantially. Higher road densities were associated with further declines (USDI Fish and Wildlife Service (1999), p. 58922).

Anderson et al. (2012) showed that watershed conditions tend to be best in areas protected from road construction and development. Using the U.S. Forest Service's Watershed Condition Framework assessment data, they showed that National Forest lands protected under the Wilderness Act tend to have

[3] We intend for the term "road density" to refer to the density of all roads within national forests, including system roads, closed roads, non-system roads, temporary roads and motorized trails, and roads administered by other jurisdictions (private, county, state).

the healthiest watersheds. In support of this conclusion, McCaffery et al. (2005) found that streams in roadless watersheds had less fine sediment and higher quality habitat than roaded watersheds. Miller et al. (2017) showed that in 20 years of monitoring forests managed by the Northwest Forest Plan there were measurable improvements in watershed conditions as a result of road decommissioning, finding "...the decommissioning of roads in riparian areas has multiple benefits, including improving the riparian scores directly and typically the sedimentation scores."

Table 3: A summary of some road-density thresholds and correlations for terrestrial and aquatic species and ecosystems (reprinted from Robinson et al. 2010).

Species (Location)	**Road density (mean, guideline, threshold, correlation)**	**Reference**
Wolf (Minnesota)	0.36 km/km2 (mean road density in primary range); 0.54 km/km² (mean road density in peripheral range)	Mech et al. (1988)
Wolf	>0.6 km/km² (absent at this density)	Jalkotzy et al. (1997)
Wolf (Northern Great Lakes region)	>0.45 km/km² (few packs exist above this threshold); >1.0 km/km² (no pack exist above this threshold)	Mladenoff et al. (1995)
Wolf (Wisconsin)	0.63 km/km² (increasing due to greater human tolerance	Wydeven et al. (2001)
Wolf, mountain lion (Minnesota, Wisconsin, Michigan)	0.6 km/km² (apparent threshold value for a naturally functioning landscape containing sustained populations)	Thiel (1985); van Dyke et al. (1986); Jensen et al. (1986); Mech et al. (1988); Mech (1989)
Elk (Idaho)	1.9 km/km² (density standard for habitat effectiveness)	Woodley 2000 cited in Beazley et al. 2004
Elk (Northern US)	1.24 km/km² (habitat effectiveness decline by at least 50%)	Lyon (1983)
Elk, bear, wolverine, lynx, and others	0.63 km/km² (reduced habitat security and increased mortality)	Wisdom et al. (2000)
Moose (Ontario)	0.2-0.4 km/km2 (threshold for pronounced response)	Beyer et al. (2013)
Grizzly bear (Montana)	>0.6 km/km²	Mace et al. (1996); Mattson et al. (1996)
Black bear (North Carolina)	>1.25 km/km² (open roads); >0.5 km/km2 (logging roads); (interference with use of habitat)	Brody and Pelton (1989)
Black bear	0.25 km/km² (road density should not exceed)	Jalkotzy et al. (1997)
Bobcat (Wisconsin)	1.5 km/km² (density of all road types in home range)	Jalkotzy et al. (1997)
Large mammals	>0.6 km/km² (apparent threshold value for a naturally functioning landscape containing sustained populations)	Forman and Hersperger (1996)
Bull trout (Montana)	Inverse relationship of population and road density	Rieman et al. (1997); Baxter et al. (1999)

Fish populations (Medicine Bow National Forest)	(1) Positive correlation of numbers of culverts and stream crossings and amount of fine sediment in stream channels (2) Negative correlation of fish density and numbers of culverts	Eaglin and Hubert (1993) cited in Gucinski et al. (2001)
Macroinvertebrates	Species richness negatively correlated with an index of road density	McGurk and Fong (1995)
Non-anadromous salmonids (Upper Columbia River basin)	(1) Negative correlation likelihood of spawning and rearing and road density (2) Negative correlation of fish density and road density	Lee et al. (1997)

E. Roads and Fires

Wildland forest fire plays an essential role in many forest ecosystems, and with climate change, fire will increasingly shape National Forest lands. Humans have made fire more common on the landscape, and studies have found that forest roads can affect fire regimes and localized fuel regimes. Changes in the timing and location of fire can alter the natural fire regime and has negative, cascading effects in ecological communities. For example, a change in timing and frequency of fire can result in habitat loss and fragmentation, shift forest composition, and affect predator-prey interactions (DellaSalla et al. 2004). Following a fire, exposed bare ground on roads can result in chronic erosion, catastrophic culvert failures, and noxious weed invasion.

Forest roads can increase the occurrence of human-caused fires, whether by accident or arson, and road access has been correlated with the number of fire ignitions (Syphard et al. 2007, Yang et al., 2007, Narayanaraj and Wimberly 2012, Nagy et al. 2018). A recent study found that humans ignited four times as many fires as lightning. This represented 92% of the fires in the eastern United States and 65% of the fire ignitions in the western U.S. (Nagy et al. 2018). Another study that reviewed 1.5 million fire records over 20 years found human-caused fires were responsible for 84% of wildfires and 44% of the total area burned (Balch et al. 2017).

In addition to changes in frequency, human-caused fires change the timing of fire occurring when fuel moisture is significantly higher than lightning-started fires (Nagy et al. 2018.). Forest roads may also limit fire growth acting as a fire break and providing access for suppression (Narayanaraj and Wimberly 2011, Robbinne et al. 2016). The result is a spatial and temporal distribution of fire that differs from historical fire regimes.

Roaded areas create a distinct fire fuels profile which may influence ignition risk and burn severity (Narayanaraj and Wimberly 2013). Forest roads create linear gaps with reduced canopy cover, and increased solar radiation, temperature, and wind speed. Invasive weeds and grasses common along roadsides also create fine fuels that are highly combustible. These edge effects can change

microclimates far into the forest (Narayanaraj and Wimberly 2012, Ricotta et al. 2018). While there is little definitive research on roads and burn severity, an increase in the prevalence of lightning-caused fires in roaded areas may be due to roadside edge effects (Arienti et al 2009, Narayanaraj and Wimberly 2012). Furthermore, watersheds that have been heavily roaded have typically received intensive management in the past leaving forests in a condition of high fire vulnerability (Hessburg and Agee 2003).

Roadless areas are remote and secure from many human impacts such as unintentional fire starts or arson. A forest fire is almost twice as likely to occur in a roaded area than a roadless area (USDA Forest Service 2000). In fact, human-ignited wildfire is almost five times more likely to occur in a roaded area than in a roadless area. (USDA Forest Service 2000). Higher road density correlates with an increased probability of human-caused ignitions. (Syphard et al. 2007).

After a forest fire, roads that were previously well vegetated often burn or are bladed for fire suppression access or firebreaks leaving them highly susceptible to erosion and weed invasion. Roads are a source of chronic erosion following a fire, and pulses of hillslope sediment and large woody debris can result in culvert failures (Bisson et al. 2003). Fine sediment is frequently delivered to streams and reduces the quality of aquatic habitat. Noxious weeds are established on many forest roads, and post-fire weed invasion can be facilitated by creating a disturbance, reducing competition, and increasing resource availability (Birdsaw et al. 2012).

II. Climate Change and Transportation Infrastructure

Before the Trump administration took office, the Forest Service recognized the importance of considering and adapting to changing climate conditions. The USDA Strategic Plan for Fiscal Years 2014-2018 set a goal to: "Ensure our national forests and private working lands are conserved, restored, and made more resilient to climate change, while enhancing our water resources." (USDA 2014, p 3). As climate change impacts grow more profound, forest managers must consider the impacts *on* the transportation system as well as *from* the transportation system. In terms of the former, changes in precipitation and hydrologic patterns will strain infrastructure, resulting in damage to streams, fish habitat, and water quality as well as threats to public safety and loss of access. As to the latter, the fragmenting effect of roads on habitat will impede the movement of species which is a fundamental element of adaptation. Through planning, forest managers can proactively address threats to infrastructure, and can actually enhance forest resilience by removing unneeded roads to create larger patches of connected habitat.

A. Climate change, forest roads, and fragmented habitat

It is expected that climate change will be responsible for more extreme weather events, leading to increasing flood severity, more frequent landslides, changing hydrographs, and changes in erosion and sedimentation rates and delivery processes (Schwartz et al. 2014, USDA FS 2018). The Forest

Service Office of Sustainability and Climate has compiled climate change vulnerability assessments for several regions of the Forest Service discussing near-term consequences for managers to consider. (Halofsky et al. 2017, 2018a, 2018b, 2019, with additional vulnerabilities displayed below in Table 4).

> Warmer locations will experience more runoff in winter months and early spring, whereas colder locations will experience more runoff in late spring and early summer. In both cases, future peakflows will be higher and more frequent, (Halofsky et al. 2018b at ii).
>
> The frequency and extent of midwinter flooding are expected to increase. Flood magnitudes are also expected to increase because rain-on-snow-driven peak flows will become more common," (*Id.* at 83).
>
> Roads and other infrastructure that are near or beyond their design life are at considerable risk to damage from flooding and geomorphic disturbance (e.g., debris slides). If road damage increases as expected, it will have a profound impact on access to Federal lands and on repair costs, (*Id.* at viii).

Magnifying these consequences is the fact that roads, culverts and trails in national forests were designed for storms and water flows typical of past decades, and may not be designed for the storms in future decades. Hence, climate driven changes may cause transportation infrastructure to malfunction or fail (USDA Forest Service 2010, ASHTO 2012). The likelihood is higher for facilities in high-risk settings—such as rain-on-snow zones, coastal areas, and landscapes with unstable geology. The following consequences may occur (USDA Forest Service 2010):

- access to national forests will be interrupted temporarily or permanently as roads wash-out due to landslides or blown-out culverts during events of heavier precipitation or flooding;
- public safety will be compromised as roads, trails and bridges become unstable due to landslides, undercut slopes, or erosion of water-logged slopes due to heavy rainfall; and
- infrastructure may be compromised or abandoned along coastal areas or low-lying estuaries when inundated during high tides and coastal storms as sea-levels rise.

Forests fragmented by roads will likely demonstrate less resistance and resilience to stressors, like those associated with climate change (Noss 2001, see also Table 4. below). First, the more a forest is fragmented (and therefore the higher the edge/interior ratio), the more the forest loses its inertia characteristic, and becomes less resilient and resistant to climate change. Second, the more a forest is fragmented, characterized by isolated patches, the more likely the fragmentation will interfere with the ability of species to track shifting climatic conditions over time and space.

> Hence, roads may impede the movement of many species in response to climate change. Closing unnecessary roads and providing wildlife crossings on roads with heavy traffic might mitigate some of these effects (Noss 1993; Clevenger & Waltho 2000), (Noss (2001) p. 584).

Watershed types within national forests may change which will impact hydrology and when high streamflows occur (Halofsky et. al. 2011). A study in Washington's Mt. Baker-Snoqualmie National

Forest (MBSNF) shows that currently 27% of the roads are in watersheds classified as rain-dominated but that will increase to 75% by 2080 - increasing risk of damage to infrastructure (Strauch 2014). By 2040, 300 miles of forest roads in this forest will be located in watersheds that are projected to see a 50% increase in 100-year floods. Landslide risk will be higher during the winter and spring and decline during summer and autumn. These changes reinforce the importance of transportation analysis that incorporates the impacts of climate change.

Earlier snowmelt may open previously snow-closed roaded areas for a greater portion of the year. While this may appear to benefit visitors that wish to access trails and camps early in the spring, this may also put them in harm's way with melting snow-bridges, avalanche chutes and flooding events (Strauch 2015). Wildlife historically protected by snow-closed roads would be more vulnerable.

B. Modifying infrastructure to increase resilience

To prevent or reduce road-triggered landslides and culvert failures, and other associated hazards, forest managers will need to take a series of actions. In December 2012, the USDA Forest Service published a report entitled, *Assessing the Vulnerability of Watersheds to Climate Change* (Furniss et al., 2013) which reinforces that forest managers need to be proactive in reducing erosion potential from roads:

> Road improvements were identified as a key action to improve condition and resilience of watersheds on all the pilot forests. In addition to treatments that reduce erosion, road improvements can reduce the delivery of runoff from road segments to channels, prevent diversion of flow during large events, and restore aquatic habitat connectivity by providing for passage of aquatic organisms. As stated previously, watershed sensitivity is determined by both inherent and management-related factors. Managers have no control over the inherent factors, so to improve resilience, efforts must be directed at anthropogenic influences such as instream flows, roads, rangeland, and vegetation management…. [Watershed Vulnerability Analysis (WVA)] results can also help guide implementation of travel management planning by informing priority setting for decommissioning roads and road reconstruction/maintenance. As with the Ouachita NF example, disconnecting roads from the stream network is a key objective of such work. Similarly, WVA analysis could also help prioritize aquatic organism passage projects at road-stream crossings to allow migration by aquatic residents to suitable habitat as streamflow and temperatures change, (Furniss et al., 2013, p. 22-23).

Other Forest Service reports support road-related actions to increase climate resilience including replacing undersized culverts with larger ones, prioritizing maintenance and upgrades, and restoring roads to a natural state when they are no longer needed and pose erosion hazards (USDA Forest Service 2010, USDA Forest Service 2011a, Furniss et al., 2013, USDA FS 2018, Halofsky et al. 2018a).

The Forest Service has developed several resources to identify and mitigate climate change impacts on forests and infrastructure. The aforementioned climate change vulnerability assessments for each

region focus on causes, consequences, and options to address them. For example, Halofsky et al. (2018a) reviews the effects and adaptation options for Region 1 (Northern Region) of the Forest Service, and identifies the increased magnitude of peak streamflows as a primary impact to road infrastructure. Adaptation strategies identified in the report include:

> ...increasing the resilience of stream crossings, culverts, and bridges to higher peakflows and facilitating response to higher peakflows by reducing the road system and disconnecting roads from streams. Tactics include completing geospatial databases of infrastructure (and drainage) components, installing higher capacity culverts, and decommissioning roads or converting them to alternative uses. (Halofsky et al. 2018a)

U.S. Forest Service Transportation Resiliency Guidebook provides a review of the impacts of climate change on Forest Service infrastructure, and a process to assess and address climate change impacts at local and regional levels (USDA FS 2018; Table 4). Included in the guidebook is a step-by-step guide for identifying vulnerabilities and preparedness planning within their transportation network (USDA FS 2018). In addition, the guidebook recommends using the forest plan revision process as "an opportunity to analyze baseline conditions and climate change vulnerabilities and to develop climate resilient strategies for the future." (USDA FS 2018). The Forest Service should use the transportation resilience guidebook to inform forest plan revision analysis and plan components to address climate change in the context of the forest's transportation system.

Table 4. Role of adaptation strategies in reducing climate change impacts of Forest Service lands (reprinted from USDA FS 2018).

	Impacts on Transportation	**Example Strategies to Reduce Impacts**
Heavy Precipitation / Flooding	Flooded roadways interrupting service Damage/destruction of roads and bridges Pavement buckling Erosion comprising soil stability and transportation assets Slope failures Landslides damaging and disrupting routes Plugged or blown out culverts	Retrofit facilities Relocate facilities Upgrade culverts and drainage facilities Build new facilities to climate ready standards Protect existing infrastructure Divest in assets
Wildfires	Additional woody debris that plug culverts Reduced slope stability causing increased landslides Increased heavy vehicle traffic wear and tear on FS roadways	Sustain forest ecology Protect forests from severe fire and wind disturbance
Tree Mortality	Fallen trees disrupt access along transportation routes Increased need for clearing hazard trees along roadways Provide forest fuel for wildfire	Facilitate Forest community adjustments through species transitions

Individual forests have also drafted climate mitigation strategies. The Olympic National Forest in Washington, has developed documents oriented at protecting watershed health and species in the face of climate change, including a 2003 travel management strategy and a report entitled, *Adapting to*

Climate Change in Olympic National Park and National Forest (USDA FS 2011a). The report calls for road decommissioning, relocation of roads away from streams, enlarging culverts as well as replacing culverts with fish-friendly crossings (Table 5). In the travel management strategy, Olympic National Forest recommended that one third of its road system be decommissioned and obliterated. In addition, the plan called for addressing fish migration barriers in a prioritized and strategic way – most of these are associated with roads.

Table 5: Current and expected sensitivities of fish to climate change and associated adaptation strategies and action for fisheries and fish habitat management and relevant to transportation management at Olympic National Forest and Olympic National Park (reprinted from USDA Forest Service 2011a).

Current and expected sensitivities	**Adaptation strategies and actions**
Changes in habitat quantity and quality	Implement habitat restoration projects that focus on re-creating watershed processes and functions and that create diverse, resilient habitat.
Increase in culvert failures, fill-slope failures, stream adjacent road failures, and encroachment from stream-adjacent road segments	Decommission unneeded roads. Remove sidecast, improve drainage, and increase culvert sizing on remaining roads. Relocate stream-adjacent roads.
Greater difficulty disconnecting roads from stream channels	Design more resilient stream crossing structures.
Major changes in quantity and timing of streamflow in transitional watersheds	Make road and culvert designs more conservative in transitional watersheds to accommodate expected changes.
Decrease in area of headwater streams	Continue to correct culvert fish passage barriers. Consider re-prioritizing culvert fish barrier correction projects.
Decrease in habitat quantity and connectivity for species that use headwater streams	Restore habitat in degraded headwater streams that are expected to retain adequate summer streamflow (ONF).

C. Reducing fragmentation to enhance aquatic and terrestrial species adaptation

Reconnecting fragmented forests has been shown to benefit native species (e.g., Damschen et al. 2019). Decommissioning and upgrading roads can reduce fragmentation of both aquatic and terrestrial systems. For example, reducing the amount of road-generated fine sediment deposited on salmonid nests can increase the likelihood of egg survival and spawning success (Switalski et al. 2004, McCaffery et al. 2007). Strategically removing or mitigating barriers such as culverts has been shown to restore aquatic connectivity and expand habitat (Erkinaro et al. 2017). Decommissioning roads in riparian areas may provide further benefits to salmon and other aquatic organisms by permitting reestablishment of streamside vegetation, which provides shade and maintains a cooler, more moderated microclimate over the stream (Battin et al. 2007, Meridith et al. 2014). Coordinating

the repair of an aging road system with the mitigation of aquatic organism passage may allow for restoring connectivity while improving infrastructure (Nesson et al. 2018).

One of the most well documented impacts of climate change on wildlife is a shift in the ranges of species (Parmesan 2006). As animals migrate, landscape connectivity will be increasingly important (Holman et al. 2005), and restoring and mitigating migration routes in key wildlife corridors will increase wildlife resiliency. Access management in important elk migration sites would reduce disturbance and improve connectivity (Parton et al. 2017). Similarly, a recent study found grizzly bear population density increased 50 percent following the restriction of motorized recreation (Lamb et al. 2018). Decommissioning roads in key wildlife corridors will also reduce the many road-related stressors. Road decommissioning restores wildlife habitat by providing security and food such as grasses, forbs, and fruiting shrubs (Switalski and Nelson 2011, Tarvainen and Tolvanen 2016).

Forests fragmented by roads and motorized trail networks will likely demonstrate less resistance and resilience to stressors, such as weeds. As a forest is fragmented and there is more edge habitat, Noss (2001) predicts that weedy species with effective dispersal mechanisms will increasingly benefit at the expense of native species. However, decommissioned roads when seeded with native species can reduce the spread of invasive species (Grant et al. 2011), and help restore fragmented forestlands. Off-road vehicles with large knobby tires and large undercarriages are also a key vector for weed spread (e.g., Rooney 2006). Strategically closing and decommissioning motorized routes, especially in roadless areas, will reduce the spread of weeds on forestlands (Gelbard and Harrison 2003).

D. Transportation infrastructure and carbon sequestration

The relationship of road restoration and carbon has only recently been explored. There is the potential for large amounts of carbon (C) to be sequestered by restoring roads to a more natural state. When roads are decompacted during reclamation, vegetation and soils can develop more rapidly and sequester large amounts of carbon. Research on the Clearwater National Forest in Idaho estimated total soil C storage increased 6-fold compared to untreated abandoned roads (Lloyd et al. 2013). Another study concluded that reclaiming 425 km (264 miles) of logging roads over the last 30 years in Redwood National Park in Northern California resulted in net carbon savings of 49,000 Megagrams (54,013 tons) of carbon to date (Madej et al. 2013, Table 5). A further analysis found that recontouring roads had higher soil organic carbon than ripping (decompacting) the roads (Seney and Madej 2015). Finally, a recent study in Colorado found that adding mulch or biochar to decommissioned roads can increase the amount of carbon stored in soil (Ramlow et al. 2018).

Kerekvliet et al. (2008) used Forest Service estimates of the fraction of road miles that are unneeded, and calculated that restoring 126,000 miles of roads (i.e. 30% of the road system) to a natural state would be equivalent to revegetating an area larger than Rhode Island. In addition, they calculate that

the net economic benefit of road treatments are always positive and range from US $0.925-1.444 billion.

Table 6. Carbon budget implications in road decommissioning projects (reprinted from Madej et al. 2013).

Road Decommissioning Activities and Processes	Carbon Cost	Carbon Savings
Transportation of staff to restoration sites (fuel emissions)	X	
Use of heavy equipment in excavations (fuel emissions)	X	
Cutting trees along road alignment during hillslope recontouring	X	
Excavation of road fill from stream crossings		X
Removal of road fill from unstable locations		X
Reduces risk of mass movement		X
Post-restoration channel erosion at excavation sites	X	
Natural revegetation following road decompaction		X
Replanting trees		X
Soil development following decompaction		X

E. The importance of Roadless Areas and intact mature forests

Undeveloped natural lands provide numerous ecological benefits. They contribute to biodiversity, enhance ecosystem representation, and facilitate connectivity and provide high quality or undisturbed water, soil and air (Strittholt and Dellasala 2001, DeVelice and Martin 2001, Crist and Wilmer 2002, Loucks et al. 2003, Dellasalla et al. 2011, Anderson et al. 2012, Selva et al. 2015). They can also serve as ecological baselines to help us better understand our impacts to other landscapes, and contribute to landscape resilience in the face of climate change.

Forest Service roadless lands, in particular, are heralded for the conservation values they provide. The benefits are described at length in the preamble of the Roadless Area Conservation Rule (RACR)[4] as well as in the Final Environmental Impact Statement (FEIS) for the RACR[5], and include: high quality or undisturbed soil, water, and air; sources of public drinking water; diversity of plant and animal communities; habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land; primitive, semi-primitive non- motorized, and semi-primitive motorized classes of dispersed recreation; reference landscapes; natural appearing landscapes with high scenic quality; traditional cultural properties and sacred sites; and other locally identified unique characteristics (e.g., include uncommon geological formations, unique wetland complexes, exceptional hunting and fishing opportunities).

The Forest Service, National Park Service, and the U.S. Fish and Wildlife Service recognize that protecting and connecting roadless or lightly roaded areas is an important action agencies can take to

[4] Federal Register, Vol. 66, No. 9. January 12, 2001. Pages 3245-3247.
[5] Final Environmental Impact Statement, Vol. 1, 3–3 to 3–7

enhance climate change adaptation. For example, the *Forest Service National Roadmap for Responding to Climate Change* (USDA Forest Service 2011b) establishes that increasing connectivity and reducing fragmentation are short- and long-term actions the Forest Service should take to facilitate adaptation to climate change. The National Park Service also identifies connectivity as a key factor for climate change adaptation along with establishing "blocks of natural landscapes large enough to be resilient to large-scale disturbances and long-term changes," and other factors. The agency states that: "The success of adaptation strategies will be enhanced by taking a broad approach that identifies connections and barriers across the landscape. Networks of protected areas within a larger mixed landscape can provide the highest level of resilience to climate change."[6] Similarly, the *National Fish, Wildlife and Plants Climate Adaptation Partnership's Adaptation Strategy* (2012) calls for creating an ecologically-connected network of conservation areas.[7]

Crist and Wilmer (2002) looked at the ecological value of roadless lands in the Northern Rockies and found that protection of national forest roadless areas, when added to existing federal conservation lands in the study area, would 1) increase the representation of virtually all land cover types on conservation lands at both the regional and ecosystem scales, some by more than 100%; 2) help protect rare, species-rich, and often-declining vegetation communities; and 3) connect conservation units to create bigger and more cohesive habitat "patches."

Roadless lands also are responsible for higher quality water and watersheds. Anderson et al. (2012) assessed the relationship of watershed condition and land management status and found a strong spatial association between watershed health and protective designations. Dellasalla et al. (2011) found that undeveloped and roadless watersheds are important for supplying downstream users with high-quality drinking water, and developing these watersheds comes at significant costs associated with declining water quality and availability. The authors recommend a light-touch ecological footprint to sustain the many values that derive from roadless areas including healthy watersheds.

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[6] National Park Service. Climate Change Response Program Brief. http://www.nature.nps.gov/climatechange/adaptationplanning.cfm. Also see: National Park Service, 2010. Climate Change Response Strategy. http://www.nature.nps.gov/climatechange/docs/NPS_CCRS.pdf. Objective 6.3 is to "Collaborate to develop cross-jurisdictional conservation plans to protect and restore connectivity and other landscape-scale components of resilience."

[7] See http://www.wildlifeadaptationstrategy.gov/pdf/NFWPCAS-Chapter-3.pdf. Pages 55- 59. The first goal and related strategies are:

> Goal 1: Conserve habitat to support healthy fish, wildlife, and plant populations and ecosystem functions in a changing climate.
> Strategy 1.1: identify areas for an ecologically-connected network of terrestrial, freshwater, coastal, and marine conservation areas that are likely to be resilient to climate change and to support a broad range of fish, wildlife, and plants under changed conditions.
> Strategy 1.2: Secure appropriate conservation status on areas identified in Strategy 1.1 to complete an ecologically-connected network of public and private conservation areas that will be resilient to climate change and support a broad range of species under changed conditions.
> Strategy 1.4: Conserve, restore, and as appropriate and practicable, establish new ecological connections among conservation areas to facilitate fish, wildlife, and plant migration, range shifts, and other transitions caused by climate change.

Allowing roadless and other intact forested areas to reach their full ecological potential is an effective and crucial strategy for atmospheric carbon dioxide removal. Moomaw et al (2019) termed this approach as "proforestation" and explained,

> [f]ar from plateauing in terms of carbon sequestration (or added wood) at a relatively young age as was long believed, older forests (e.g., >200 years of age without intervention) contain a variety of habitats, typically continue to sequester additional carbon for many decades or even centuries, and sequester significantly more carbon than younger and managed stands, (Luyssaert et al., 2008; Askins, 2014; McGarvey et al., 2015; Keeton, 2018).

The authors recommend "scaling up" proforestation, which includes both protecting and expanding designations of intact forested areas, as a cost-effective means to increase atmospheric carbon sequestration.

III. Achieving a Sustainable Minimum Road System on National Forest Lands

A. Background

For two decades, the Travel Management Rule, 36 C.F.R. Part 212, has guided Forest Service road management and use by motorized vehicles. It is divided into three parts: Subpart A, the administration of the forest transportation system; Subpart B, designation of roads, trails, and areas for motor vehicle use; and Subpart C, use by over-snow vehicles. *See* 36 C.F.R. Part 212.

Table 7. Travel Management Rule Subparts – Objectives, Requirements & Products

36 C.F.R. §212	Objective:	Requires:	Product(s):
Subpart A; Roads Rule 2001	To achieve a sustainable national forest road system.	Use a science-based analysis to identify the minimum road system and roads for decommissioning	- Travel Analysis Report - Map with roads identified as "likely needed" and "likely unneeded"
Subpart B; Travel Management Rule 2005	To protect forests from unmanaged off-road vehicle use by ending cross-country travel and ensuring the agency minimizes the harmful effects from motorized recreation.	Designating a system of roads, trails and areas available for off-road vehicle use according to general and specific criteria.	- Motor Vehicle Use Maps that indicate what roads/trails are open for motorized travel
Subpart C; Travel Management Rule	To protect forests from unmanaged over-snow vehicle use in a manner that minimizes their harmful effects.	Designating specific roads, trails and/or areas for oversnow vehicle use according to the criteria per	- Oversnow vehicle maps designating trails and areas for winter motorized recreation

		Subpart B.	

This broad-based national rule is needed because at over 370,000 miles, the Forest Service road system is long enough to circle the earth over 14 times and it is over twice the size of the National Highway System.[8] It is also indisputably unsustainable from ecological, economic and management perspectives. The majority of the roads were constructed decades ago when design and management techniques did not meet current standards (Gucinski et al. 2000, Endicott 2008), making them more vulnerable to erosion and decay. Further, current design standards and best management practices have not been updated to address climate change realities. Exacerbating the problem are massive Forest Service road maintenance backlogs that forces the agency to forego actions necessary to ensure proper watershed function, such as preventing sediment pollution and sustaining aquatic organism passages. Nationally, the total deferred maintenance backlog reached $5.5 billion in FY 2019 of which $3.1 billion is associated with roads.[9] As a result, the road network is not only a massive economic liability, it is also actively harming National Forest System lands, waters, fish and wildlife.

Over the past two decades the Forest Service - largely due to the Travel Management Rule - has made some limited efforts to identify and implement a sustainable transportation system. Yet, overall the agency has yet to meet the requirements of Subpart A. The challenge for forest managers is figuring out what is a sustainable road system and how to achieve it – a challenge exacerbated by climate change. It is reasonable to define a sustainable transportation system as one where all the roads and trails are located, constructed, and maintained in a manner that minimizes harmful environmental consequences while providing social benefits and within budget constraints. This could potentially be achieved through the use of effective best management practices. However, the reality is that even the best transportation networks can be problematic simply because they exist and usher in land uses that, without the access, would not occur (Trombulak and Frissell 2000, Carnefix and Frissell 2009, USDA Forest Service 1996), and when they are not maintained to the designed level they result in environmental problems (Endicott 2008; Gucinski et al. 2000). Moreover, what was sustainable yesterday may no longer be sustainable under climate change realities since roads designed to meet older climate criteria may no longer hold up under new scenarios (USDA Forest Service 2010, USDA Forest Service 2011b, AASHTO 2012, Furniss et al., 2013, Schwartz et al. 2014, USDA FS 2018, Halofsky et al. 2018a, 2018b).

Given consistent budget shortfalls and increasing risks from climate change vulnerabilities, it is clear the agency has an urgent need to both identify and implement a minimum road system, one that will ensure the protection of all Forest Service system lands. However, without specific direction from the Forest Service's Washington D.C. office or Congress, it is reasonable to expect the agency will

[8] USDOT Federal Highway Administration, Office of Highway Policy Information. https://www.fhwa.dot.gov/policyinformation/pubs/hf/pl11028/chapter1.cfm
[9] USDA Forest Service. 2019. FY2020 Budget Justification. p.83.

continue to rely on piecemeal, project-level analyses to identify the minimum road system. Such an approach is inefficient, and insufficient to achieve a sustainable road system forestwide.

Further, where the Forest Service does act to comply with Subpart A, it typically fails to consider shortcoming in its previous travel analysis processes. In fact, an independent review of 38 Travel Analysis Processes and corresponding reports conducted in 2016 by the U.S. Department of Transportation John A. Volpe National Transportation Systems Center found three overarching concerns:

- A lack of clarity regarding the process;
- Failure to follow 36 CFR 212.5(b) direction and Washington Office guidance; and
- Omission of required documents, referenced appendices, or key supporting materials.

Compounding these concerns is the fact that not only do project-level NEPA analyses fail to account for the TAP shortcomings, they also fail to consider real road/motorized densities when identifying the minimum road system. Moreover, these analyses erroneously assume best management practices and project-specific design features will be effective when the Forest Service authorizes actions to achieve a sustainable road system. Finally, if the project-level decision includes actual road decommissioning, the analysis typically fails to consider or specify treatments, resulting in a legacy of ghost-roads persisting on the landscape. The following sections expand on these shortcomings, which the Forest Service must consider in all project-level analyses, and when revising its land and travel management plans.

B. Using Real Road and Motorized Trail Densities to Identify a Minimum Road System

As the Forest Service works to comply with Subpart A, it is crucial that the agency incorporate the true road and motorized trail densities in both its travel analysis process and NEPA-level analyses. Further, the agency must establish standards in land management plan revisions and amendments to ensure each forest achieves an ecologically sustainable minimum road system. Road density analyses should include closed roads, non-system roads, temporary roads, and motorized trails. Typically, the Forest Service calculates road density by looking only at open system road density. From an ecological standpoint, this is a flawed approach since it leaves out the density calculations of a significant percent of roads and motorized trails on the landscape. These additional roads and motorized trails impact fish, wildlife, and water quality, and in some cases, have more of an impact than open system roads. In this section, we provide justification for why a road density analyses should include more than just open road density whenever the Forest Service evaluates the ecological health of an area during NEPA-level analysis or other processes such as for watershed assessments, forest plan revisions or during travel analysis.

Impacts of closed roads

It is crucial to distinguish the density of roads physically present on the landscape, whether closed to vehicle use or not, from "open-road density." An open-road density of 1.5 mi/mi² has been established as a standard in some national forests as protective of some terrestrial wildlife species. However, many areas with an open road density of 1.5 mi/mi² often have more miles of closed roads which are still hydrologically connected and negatively affecting aquatic and wildlife habitat. This higher density occurs because many road "closures" may block vehicle access, but do nothing to mitigate the hydrologic alterations the road causes. The problem is often further compounded by the existence of "ghost" roads that are not captured in agency inventories, but that are nevertheless physically present and causing hydrologic alteration (Pacific Watershed Associates 2005).

Closing a road to public motorized use can mitigate the impacts on water, wildlife, and soils only if proper closure and storage techniques are followed. Flow diversions, sediment runoff, and illegal incursions will continue unabated if the road is not hydrologically stabilized and adequately blocked from motorized traffic. The Forest Service's National Best Management Practices for non-point source pollution recommends the following management techniques for minimizing the aquatic impacts from closed system roads: eliminate flow diversion onto the road surface, reshape the channel and streambanks at the crossing-site to pass expected flows without scouring or ponding, maintain continuation of channel dimensions and longitudinal profile through the crossing site, and remove culverts, fill material, and other structures that present a risk of failure or diversion (USDA Forest Service 2012).

As noted above, many species benefit when roads are closed to motorized use. However, the fact remains that closed system roads are often breached resulting in impacts to fish and wildlife. A significant portion of gates and closure devices are ineffective at preventing motorized use (Griffin 2004, USFWS 2007). For example, in a legal decision from the Utah District Court, *Sierra Club v. USFS*, Case No. 1:09-cv-131 CW (D. Utah March 7, 2012), the court found that, as part of analyzing alternatives in a proposed travel management plan, the Forest Service failed to examine the impact of continued illegal use. In part, the court based its decision on the Forest Service's acknowledgement that illegal motorized use is a significant problem and that the mere presence of roads is likely to result in illegal use.

In addition to the disturbance to wildlife from motorized use, incursions and the accompanying human access can also result in illegal hunting and trapping of animals. The Tongass National Forest refers to this in its EIS to amend the Land and Resources Management Plan. Specifically, the Forest Service notes in the EIS that Alexander Archipelago wolf mortality due to legal and illegal hunting and trapping is related not only to roads open to motorized access, but to all roads, and that *total road densities* of 0.7-1.0 mi/mi² or less may be necessary (USDA Forest Service 2008).

Impacts of unauthorized (non-system) roads

As of 1998, there were approximately 130,000 miles of non-system roads in national forests (USDA Forest Service, 1998). However, the creation of unauthorized roads continues to be a problem as the Forest Service struggles to properly enforce travel management plans protecting areas from motorized travel. No requirements are in place directing the agency to track or inventory unauthorized roads, therefore currently their precise number is unknown. These roads contribute significantly to the environmental impacts of the transportation system on forest resources, just as forest system roads do. Because the purpose of a road density analysis is to measure the impacts of roads at a landscape level, the only way to do this is for the Forest Service to include all roads, including non-system roads, when measuring impacts. An all-inclusive analysis will provide a more accurate representation of the environmental impacts of the road network within the analysis area.

Impacts of temporary roads

Temporary roads are not considered system roads. Most often they are constructed in conjunction with timber sales. Temporary roads have the same types of environmental impacts as system roads, although at times the impacts can be worse if the road persists on the landscape because they are not built to last. It is important to note that although they are termed temporary roads, their impacts are not temporary. According to Forest Service Manual (FSM) 7703.1, the agency is required to "Reestablish vegetative cover on any unnecessary roadway or area disturbed by road construction on National Forest System lands within 10 years after the termination of the activity that required its use and construction."

Regardless of the FSM 10-year direction, temporary roads often remain for much longer because timber sale contracts typically last 3-5 years or more. If the timber purchaser builds a temporary road in the first year of a five-year contract, its intended use may not end until the full project is complete, which can include post-harvest actions such as prescribed burning. Even though the contract often requires the purchaser to close, obliterate and seed the roadbed with native vegetation, this work typically occurs after a few years of treatment activities. The temporary road, therefore, could remain open for 7-8 years or longer before the FSM ten-year clock starts ticking. Therefore, temporary roads can legally remain on the ground for up to 20 years or more, yet they are constructed with fewer environmental safeguards than modern system roads. Exacerbating the problem is the rise of landscape-scale projects that last between 10-20 years. Unless there is explicit direction requiring temporary road removal within a certain time after treatment activities, it is likely these roads could persist for decades.

Impacts of motorized trails

Motorized use on trails has serious harmful effects similar to roads, and it is crucial for the Forest Service to include motorized trails in its density calculations. As we note several times in Section I above, scientific research and agency publications find similar impacts between motorized trails and roads. Off-road vehicle (ORV) use on trails impact multiple resources, resulting in soil compaction

and erosion, trampling of vegetation, as well as wildlife habitat loss, disturbance, and direct mortality. Many of these impacts increase on trails not planned or designed for vehicles, as is often the case when the Forest Service designates ORVs on trails built for hiking or equestrian uses. In many instances the agency designates motorized use on unauthorized trails created through illegal use or from a legacy of unmanaged cross-country travel, further exacerbating the related harmful effects. For a full review of the environmental and cultural impacts on forest lands see Switalski and Jones (2012), and for a review of impacts in arid environments see Switalski (2018).

C. Using Best Management Practices to Achieve a Sustainable Road System

Numerous Best Management Practices (BMPs) were developed to help create a more sustainable transportation system and identify restoration opportunities. BMPs provide science-based criteria and direction that land managers follow in making and implementing decisions about human uses and projects that affect natural resources. Several states have developed BMPs for road construction, maintenance, and decommissioning practices (e.g., Logan 2001, Merrill and Cassaday 2003). The report entitled, National Best Management Practices for Water Quality Management on National Forest System Lands, includes specific road BMPs for controlling erosion and sediment delivery into waterbodies and maintaining water quality (USDA FS 2012). These BMPs cover road system planning, design, construction, maintenance, and decommissioning as well as other transportation-related activities.

Forest Service BMPs - Implementation and Effectiveness

While national BMPs have been established, the effectiveness of individual BMPs, and whether they are implemented at all, is in question. Furthermore, design features are increasingly replacing BMPs for project-level mitigation of road-related environmental impacts. These design features are not consistent among projects, but rather adapted from forest plans and state BMPs, rather than national Forest Service guidelines. Design features need to be standardized, and their rate of implementation and effectiveness systematically reviewed.

When considering how effective BMPs are at controlling nonpoint pollution on roads, both the rate of implementation, and their effectiveness should both be considered. The Forest Service tracks the rate of implementation and the relative effectiveness of BMPs from in-house audits. This information is summarized in the *National BMP Monitoring Summary Report* with the most recent data being the fiscal years 2013-2014 (Carlson et al. 2015). The rating categories for implementation are "fully implemented," "mostly implemented," "marginally implemented," "not implemented," and "no BMPs." "No BMPs" represents a failure to consider BMPs in the planning process. More than a hundred evaluations on roads were conducted in FY2014. Of these evaluations, only about one third of the road BMPs were found to be "fully implemented" (Carlson et al. 2015, p. 12).

The monitoring audit also rated the relative effectiveness of the BMP. The rating categories for effectiveness are "effective," "mostly effective," "marginally effective," and "not effective."

"Effective" indicates no adverse impacts to water from project or activities were evident. When treated roads were evaluated for effectiveness, almost half of the road BMPs were scored as either "marginally effective" or "not effective" (Carlson et al. 2015, p. 13). However, BMPs for completed road decommissioning projects showed approximately 60 percent were effective and mostly effective combined, but it was unclear what specific BMPs account for this success (Carlson et al. 2015, p. 35). As explained below, road recontouring that restores natural hillside slopes is a more effective treatment compared to those that leave road features intact.

A recent technical report by the Forest Service entitled, *Effectiveness of Best Management Practices that Have Application to Forest Roads: A Literature Synthesis* summarized research and monitoring on the effectiveness of different BMP treatments for road construction, presence and use (Edwards et al. 2016). They found that while several studies have found some road BMPs are effective at reducing delivery of sediment to streams, the degree of each treatment has not been rigorously evaluated (Edwards et al. 2016). Few road BMPS have been evaluated under a variety of conditions, and much more research is needed to determine the site-specific suitability of different BMPs (Edwards et al. 2016, also see Anderson et al. 2011).

Edwards et al. (2016) cites several reasons for why BMPs may not be as effective as commonly thought. Most watershed-scale studies are short-term and do not account for variation over time, sediment measurements taken at the mouth of a watershed do not account for in-channel sediment storage and lag times, and it is impossible to measure the impact of individual BMPs when taken at the watershed scale. When individual BMPs are examined there is rarely broad-scale testing in different geologic, topographic, physiological, and climatic conditions. Further, Edwards et al. (2016) observes, "The similarity of forest road BMPs used in many different states' forestry BMP manuals and handbooks suggests a degree of confidence validation that may not be justified," because they rely on just a single study. Therefore, BMP effectiveness would require matching the site conditions found in that single study, a factor land managers rarely consider.

Climate change will further put into question the effectiveness of many road BMPs (Edwards et al. 2016). While the impacts of climate will vary from region to region (Furniss et al. 2010), more extreme weather is expected across the country which will increase the frequency of flooding, soil erosion, stream channel erosion, and variability of streamflow (Furniss et al. 2010). BMPs designed to limit erosion and stream sediment for current weather conditions may not be effective in the future. Edwards et al. (2016) states, "More-intense events, more frequent events, and longer duration events that accompany climate change may demonstrate that BMPs perform even more poorly in these situations. Research is urgently needed to identify BMP weaknesses under extreme events so that refinements, modifications, and development of BMPs do not lag behind the need."

The uncertainties about BMP effectiveness as a result of climate change, compounded by the inconsistencies revealed by BMP evaluations, suggest that the Forest Service cannot simply rely on them, or design features/criteria, as a means to mitigate project-level activities. This is especially relevant where the Forest Service relies on the use of BMPs instead of fully analyzing potentially

harmful environmental consequences from road design, construction, maintenance or use, in studies and/or programmatic and site-specific NEPA analyses.

D. Effectiveness of Road Decommissioning Treatments

In order to truly achieve a sustainable minimum road system, the Forest Service must effectively remove unneeded roads. According to the Forest Service, the objective of road decommissioning is to "stabilize, restore, and revegetate unneeded roads to a more natural state to protect and enhance NFS lands" (FSM 7734.0). However, rather than actively removing roads, the Forest Service is increasingly relying on abandoning roads to reach decommissioning treatment objectives (Apodaca et al.2018). Simply closing or abandoning roads will lead to continued resource damage. Other treatments such as ripping the roadbed or installing drainage such as waterbars or dips, have limited and often short-term benefits to natural resources (e.g., Luce 1997, Switalski et al. 2004, Nelson et al. 2010). Recontouring roads is the only proven method to attain the intended outcome of road decommissioning.

Several studies have documented the benefits of fully recontouring roads for ecological restoration. Lloyd et al. (2013) found that rooting depths were much deeper in recontoured roads than in abandoned roads in Idaho, and soil organic matter was an order of magnitude higher on recontoured roads than abandoned roads. Further studies show that soil carbon storage is much higher on recontoured roads as well. A study in Northern California found that recontouring roads resulted in higher soil organic carbon than ripping the roads (Seney and Madej 2015). Higher tree growth and wildlife use has also been found on and near recontoured roads than ripped or abandoned roads (Kolka and Smidt 2004, Switalski and Nelson 2011). Switalski and Nelson (2011) found increased use by black bears on recontoured roads than closed or abandoned roads due to increased food availability and increased habitat security. In addition, removing culverts at stream crossings results in restoring aquatic connectivity and expanding habitat (Erkinaro et al. 2017).

Legacy Roads Monitoring Project

Since 2008, the Forest Service Rocky Mountain Research Station has conducted systematic monitoring on the effectiveness of decommissioned roads in reducing hydrologic and geomorphic impacts from the Forest Service road network. One intent of the monitoring project was to gauge the success of the Legacy Roads and Trails Program that Congress established to provide dedicated funding for the treatment and removal of unnecessary forest roads. The monitoring found that recontouring roads and restoring stream crossings results in dramatic declines in road-generated sediment. Storm-proofing treatments lead to fewer benefits, and on control sites (untreated or abandoned roads), high levels of sediment delivery continued, and the risk of culvert failures remained. For example, a study on the Lolo Creek Watershed on the Clearwater National Forest

found a 97% reduction in road/stream connectivity following road recontour (Cissel et al. 2011). Using field observations and the Geomorphic Roads Analysis and Inventory Package (GRAIP), they found a reduction of fine sediments from 38.1 tonnes/year to 1.3 tonnes/year along 3.5 miles of road. Furthermore, they found that restoring road/stream crossings eliminated the risk of culverts plugging, stream diversions, and fill lost at culverts (Table 8).

On the other hand, monitoring conducted on the Caribou-Targhee National Forest found only a 59% reduction of fine sediment delivery from a combination of storm proofing (installation of drain dips), ripping, tilling, and outsloping techniques. There was a reduction of 34.9 tons/year to 14.1 ton/year – leaving a significant amount of sediment continuing to be delivered to streams. Additionally, some stream crossing culverts were not treated and the risk of plugging remained leaving 330 m^3 of fill material at risk. While trail conversion and decommissioning treatments reduced slope failure risks, in some cases storage treatments actually increased the risk of failure (Nelson et al. 2010). Additional monitoring studies conducted in Montana, Idaho, Washington, Oregon, and Utah have similar results.[10]

Table 8. Summary of GRAIP road risk predictions for a watershed on the Clearwater National Forest road decommissioning treatment project (reprinted from Cissel et al. 2011).

IMPACT/RISK TYPE	**EFFECT OF TREATMENT: INITIAL GRAIP PREDICTION**
Road-stream hydrologic connectivity	-97%, -2510 m
Fine Sediment Delivery	-97%, -36.8 tonnes/yr.
Landslide Risk	Reduced to near natural condition
Gully Risk	Reduced from very low to negligible
Stream Crossing Risk -plug potential -fill at risk -diversion potential	 -100% eliminated at 9 sites -100%, 268 m^3 fill removed -100%, eliminated at 3 sites
Drain Point Problems	17 problems removed, 4 new problems

[10] For reports visit https://www.fs.fed.us/GRAIP/LegacyRoadsMonitoringStudies.shtml

The Forest Service recognizes that fundamental to road decommissioning is revegetating the roadbed. FSM 7734 states, "Decommission a road by reestablishing vegetation and, if necessary, initiating restoration of ecological processes interrupted or adversely impacted by the unneeded road." However, roads are inherently difficult to revegetate because of compaction, lack of soil and organic material, low native seedbank, and presence of noxious weeds (Simmers and Galatowitsch 2010, Ramlow et al. 2018). Many recently acquired industrial timberlands (e.g. Legacy Lands) have road systems with limited canopy cover, little woody debris available, and a large weed seedbank. Thus, revegetation is going to be particularly challenging on these lands.

Consistent application of BMPs that direct recontouring roads for decommissioning will be essential to ensure the treatments best achieve improvements in ecological conditions. More than any other treatment, road recontouring ensures complete decompaction of the roadbed, incorporates native soils that were side-cast during construction, and prevents motorized use. This in turn increases plant rooting depths, soil carbon storage, tree growth, and wildlife use. Any earth disturbing activity can create conditions favorable to noxious weeds, so treating weeds before any treatment and ensuring quick revegetation can limit weeds spread. Applying road recontour BMPs that also mitigate risks associated with noxious weed expansion will help prevent their spread

Conclusion

Numerous studies show that roads and motorized trails negatively impact the ecological integrity of terrestrial and aquatic ecosystems and watersheds. There is ample evidence to confirm the harm to wildlife, aquatic species, water quality, and natural processes from forest roads and motorized use. In addition, the evolving science surrounding roads and wildfire demonstrate a direct link between access and human-caused ignitions, and also suggests that land managers must consider how roads affect fire behavior. Minimizing these impacts by reducing road densities could be an effective solution.

An increasing body of literature exists demonstrating that not only is the Forest Service's transportation infrastructure highly vulnerable to climate change, but also that roads exacerbate climate change's harmful effects to other resources. The agency itself has published multiple reports and guidelines for adaptation, yet few forests are fully translating the information into tangible actions. The Forest Service must implement climate change adaptations as soon as possible, including protecting and expanding intact forests as part of a growing effort to promote natural climate change solutions. Opportunities exist to reduce fragmentation, sequester carbon, and expand roadless areas by implementing a minimum road system.

The Forest Service must fulfil its mandate to achieve an ecologically and economically sustainable forest road system by fully complying with the Roads Rule's requirement to identify a minimum road system. Inconsistent policy interpretations, inadequate travel analysis reports and lack of accountability has largely left this goal wholly out of reach. Yet this work remains vitally important,

especially in the context of climate change. The Forest Service should reinvigorate its efforts to comply with the rule's requirements. Towards this end, the agency must include current science, particularly related to future climate conditions. All road and motorized trail densities should be included in the analysis. When the agency actually does identify a minimum road system and proposes to remove unneeded roads, it must carefully evaluate the effectiveness of all proposed BMPs and design features, and fully implement the most effective decommissioning treatments to maximize restoring ecological integrity to the area. These actions will ensure the Forest Service finally achieves its goal to establish a truly sustainable forest road system.

Recontoured road, Olympic National Forest - Skokomish Watershed, 2017. By WildEarth Guardians

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ATTACHMENT D

Available at: https://www.allaboutbirds.org/old-flames-the-tangled-history-of-forest-fires-wildlife-and-people/ (last accessed June 20, 2019)

All About Birds

Story By Hugh Powell; Photographs by Jeremy Roberts

Black-backed Woodpecker by Jeremy Roberts/Conservation Media.

June 17, 2019

A yellow plastic sign stapled to a skinny black tree warned ENTERING BURN: STAY ON ROADS AND TRAILS. It was a classic June day in western Montana: 50 degrees and you judge how good the weather is by how hard the rain is beating against the windshield. I was in the passenger seat of a Jeep Grand Cherokee, and Richard Hutto, a professor emeritus at the University of Montana, was leading me into the heart of the Rice Ridge Fire burn area in the foothills of the Swan mountain range.

Nine months earlier, in September 2017, this burn was the nation's top firefighting priority during the second-most-expensive fire season on record. Rice Ridge eventually consumed 160,000 acres of forest and cost the U.S. Forest Service $49 million to fight. Smoke levels in nearby Seeley Lake went off the charts (actually exceeding what the air quality sensors could measure). An evacuation order was issued, and the local high school had to move its classes to a nearby dude ranch.

"You couldn't have asked for a better fire," Hutto said, and as an ecologist he was serious. He drove on past the sign and into what he calls "nature's best-kept secret," a young burned forest.

In every direction bare trees reached up into the low gray sky, their naked branches pinwheeling off trunks as black as chainsaw oil. Yet on the ground, tiny starbursts of beargrass were already creeping out of fireproof stems, singed at the tips but otherwise brilliant green against the black soil. Off in the distance, a swath of burned trees swept down a valley and up the next slope, the red-needled edges forming huge paisleys on the green mountainside.

Severely burned forests can look barren, but beetles, birds, and other wildlife begin returning as soon as the flames go out. *Photo by Hugh Powell.*

Birds were everywhere. Western Tanagers chirruped and Western Wood-Pewees buzzed. A Mountain Bluebird the color of movie-star eyes gleamed from a jet-black spar of larch. A Hermit Thrush sang, and everywhere woodpeckers—Hairy, Downy, American Three-toed, Northern Flicker—rattled, cackled, and whinnied.

There was one other splash of color: blue flagging tape tied around the black trees. It was there to mark areas slated for salvage logging, which is the industry term for cutting dead wood in order to capitalize on its economic value.

Here on this muddy Forest Service road, two conflicting views of fire were meeting head-on. One view, currently prevailing among society at large, regards Rice Ridge as a costly and tragic "megafire," a catastrophe that endangered homes and destroyed valuable forest that would take decades to recover. If you buy this view—of burned forest as ruined forest—then salvage logging seems only prudent, a way to temper the losses the fire inflicted.

Because of increased sunshine and available nutrients, wildflowers grow abundantly in burned forests for the first decade or more after a fire.

But many fire ecologists have long had an alternate perspective on large, severe fires like Rice Ridge: that they are inevitable and largely unstoppable, like a hurricane. Far from destroying forests, these fires touch off a frenzy of ecological activity—a tumult of new plants, mushrooms, insects, amphibians, birds, and mammals—that's unlike anything that happens in the quiet shade of a green forest.

"This is a habitat that's like no other habitat on Planet Earth," Hutto says, and salvage logging is just about the worst thing that could be done to it. "If you take the [burned] trees out, all these special things go away."

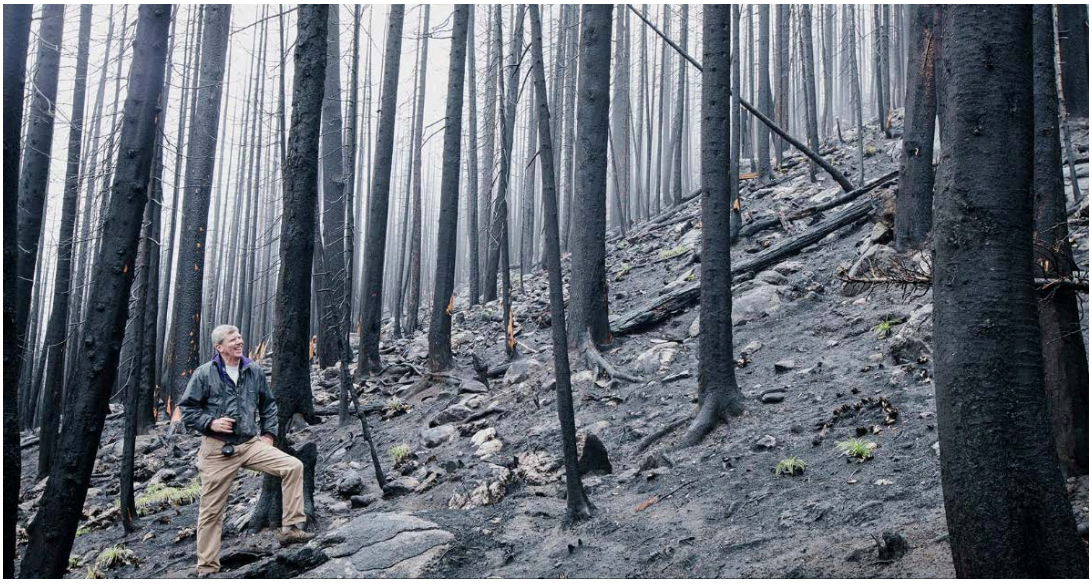
It was exploring this dichotomy—wildfire as disaster versus wildfire as essential natural process—that drew me back out West last June, back into the burned forests I'd fallen in love with 20 years ago. Back then I was one of Hutto's graduate students, and I studied the Black-backed Woodpecker, a bird that is intimately adapted to burned forests. I spent three years covered in soot and camping among the jet-black trees, watching the forest come back to life.

This is a habitat that's like no other habitat on Planet Earth.~Richard Hutto

Today the fire season is longer than it was during my grad school days. The long-term trends show fire seasons are nearly three months longer than they were in the 1970s. And 100,000-acre megafires are burning more frequently. Yet little has changed in how the U.S. government approaches fire, besides the price tag. From 1985 to 1995 the U.S. spent just over $4 billion fighting fires; from 2008 to 2018 it spent nearly $20 billion.

Meanwhile, more homes are being built in harm's way, in the spaces where towns and forest intermingle and where fires will eventually burn as surely as hurricanes will strike the Gulf Coast. More than 12.7 million new homes went up in this "wildland-urban interface" just between 1990 and 2010. And with each new fire, journalists and politicians repeat the same three misconceptions—about fuel accumulation, the need to suppress fire, and the need to salvage log—all built on the mistaken impression that fire is unnatural.

"You'd be hard-pressed to find any patch of forest in the Northern Rockies that isn't in one stage or another of succession following a severe fire event," Hutto says. "If you want to use [fire] funding to save a house from burning down, fine. That's a disaster. But a fire burning out in the middle of nowhere is not a disaster."



University of Montana professor emeritus Richard Hutto has been studying the ecology of wildfires since the 1980s. *Photo by Jeremy Roberts/Conservation Media.*

Back at Rice Ridge, we wandered off the roadside in search of an American Three-toed Woodpecker that was tattooing the tippy-top of a charred Douglas-fir. This was a stand-replacement or crown fire—the terrifying kind that leaps into the canopy, sends up walls of flame, and rips across the landscape. It's precisely this most powerful, least tameable kind of fire that Hutto says people need to make peace with.

It only takes one visit to a burned forest to realize it's much more than a pile of ash at the bottom of a charcoal grill. A burned forest is more like a bank vault with the door blown wide open. Fire knocks out a tree's chemical defenses but barely touches its nutritious interior. Far from being dried husks, fire-killed trees stay so insulated you can still squeeze water out of the inner bark a year after a fire.

Morel mushrooms proliferate in the spring following a severe fire, giving rise to a lucrative, if ragtag, industry of wild mushroom foraging. *Photo by Jeremy Roberts/Conservation Media.*

With the bank vault open, the bugs come rushing in. One group of beetles uses special heat-sensing organs to colonize a forest fire before it even cools off; another type does the same thing by following smoke plumes. These are some of the most stupendous beetles I've ever seen—some are glittering green-and-gold; some the color of cinders and highlighted with orange; others with black-and-white antennae three times as long as their bodies.

The beetles lay eggs, and their larvae tunnel through the tree eating everything in sight. Predatory beetles and parasitic wasps flood in to feed off the larvae, and the food web takes off from there.

Morel mushrooms come up in carpets, enough to fuel a ragtag foraging industry in burns that's worth up to $10 million annually. In some areas, boreal toads move in to breed in ponds warmed under the open canopy; and plants such as beargrass, fireweed, mariposa lilies, lupine, and geraniums spring up into the abundant sunshine.

This flush of food brings in woodpeckers, flycatchers, thrushes, swallows, and finches. To demonstrate, Hutto cocks an ear and gives a running commentary on what he hears:

Western Wood-Pewee: "It always amazes me. This is a cottonwood bottomland bird, and then it shows up in these fires, far away from where it 'ought' to be."

Tree Swallows: "Nothing, no other bird, likes it as severely burned as Tree Swallows. When it's toasty and completely black, they love it."

A Black-backed Woodpecker carries a meal of beetle larvae back to his chicks. Though Black-backeds are the best known fire-associated bird species, many other birds also use burned forests. *Photo by Jeremy Roberts/Conservation Media.*

Mountain Bluebirds: "If you had been standing here this time last year, I guarantee there would not have been a Mountain Bluebird here. They are all about burns. The higher the severity, the more of them you find."

Nowadays Hutto can back up claims like these with piles of data from more than 16,000 monitoring sites throughout the Northern Rockies. But all his work began with a small paper published in *Conservation Biology*, on the famous 1988 Yellowstone fires, when 1.4 million acres in and out of the park burned in a single season.

His key realization was that birds don't just make do with whatever's left after a fire—they seek out burns for their unique mix of rich food supplies, abundant nest sites, and relative lack of predators. After visiting 34 burns in the first two years after the Yellowstone fires, he found 15 species that were nowhere more abundant in the Northern Rockies than in young burns. As if to prove his point, we saw 11 of these 15 birds on our first day at Rice Ridge, including Olive-sided Flycatcher, Cassin's Finch, and Townsend's Solitaire.

Chief among these fire-adapted species is the Black-backed Woodpecker, which Hutto found in 78% of the burns he surveyed and almost nowhere else. In the Northern Rockies, he says, "they are as restricted to burns as a Belted Kingfisher is to rivers."

But Hutto cautions against focusing on a single species as a poster child for burn areas: "It's not about Black-backed Woodpeckers. They're an indicator. They're just whispering in my ear about the bigger issue, the need for natural fire in these mountains."

The larger point, he argued in a 2008 paper published in *Ecological Applications*, is that the abundance of life after a forest fire is no accident. If crown fires are an anomaly, a lapse of proper forest management, he asked, then how can there be so many examples of animals that over millennia have evolved ways to find and capitalize on them?

The burn area of the 160,000-acre Rice Ridge Fire displays the classic mosaic pattern that's created by forest fires in the West. Patches of green, brown, and black add to the landscape's habitat diversity in the years following the fire. *Photo by Jeremy Roberts/Conservation Media.*

The United States got off on the wrong foot with fire back in 1910, during what is still the West's worst fire season on record. Over just two days in August, a complex of fires across Montana and Idaho burned 3 million acres and killed 78 firefighters.

Smokey Bear's public relations campaign in the 20th century created a widespread misconception that fires are unnatural. Today U.S. Forest Service messaging suggests focusing on living safely with fire. *Poster from the U.S. Department of Agriculture, Forest Service, 1952.*

In response, the U.S. Forest Service doubled down on firefighting, eventually enacting a policy goal of putting out all fires by 10 a.m. the day after they were spotted. In 1944 the Forest Service invented Smokey Bear, and Smokey began a campaign of pulling heartstrings, pointing fingers, and driving home a message that no fire is acceptable. It was well-intentioned, but it was disastrously successful in shaping the public's view of wildfire.

"We as a society only see [burned forest] as destroyed forest, because we've been conditioned to believe that forests should be green and they shouldn't change," says Tania Schoennagel, a fire scientist at the University of Colorado. "But that high-severity fire that burns like hell and is terrifying, that is business as usual for [many] forests."

Starting in the 1970s, studies of the comparatively gentle fires in Southwestern ponderosa pine softened Smokey's viewpoint somewhat, and a new conventional wisdom emerged: Understory burns are good, but severe fires are bad. Understory burns make forests healthy and safe by keeping fuels in check, or so the argument goes, while severe fires are disasters that happen only because a century of fire suppression has allowed fuel to build up.

"The problem is [the public has] over-learned that story," Schoennagel says, "because it's so tractable and appealing, and they now see that story everywhere."

Those dry ponderosa pine forests turned out to be a special case, not a general rule. They're so dry that barely enough fuel can grow in a year to allow a fire to spread. In almost every other Western forest type, from mixed conifer to lodgepole pine to spruce-fir, the climate is cooler and moister. Plenty of fuel grows each year, but it takes a major drought to dry it out enough to burn. Before climate change, this happened every 50 to 200 years or so, depending on the forest type.

In other words, what fire scientists call a forest's "fuel load" is not the main cause of large, unstoppable fires; it's climate factors such as temperature, humidity, and especially wind. But weather is ephemeral and invisible, while thick underbrush is easy to see and photograph. So in wider society, the conversations are still all about fuels. From President George W. Bush's Healthy Forests Initiative of 2003 straight through to California governor Gavin Newsom's emergency declaration in 2019, the fixation on reducing fuels through thinning and prescribed burning spans decades and political parties.

Large fires happen during periods of unusual drought and high wind. When those ingredients come together—as they have been doing increasingly with the effects of climate change—there's almost always enough fuel to keep a fire going. In fact, because firefighters put out so many fires, it virtually guarantees that when fires do break out of control, it's only when conditions are dry, windy, and primed for very dangerous, rapidly spreading fires—a phenomenon dubbed the "wildfire paradox" by three fire scientists in a 2014 paper published in *Proceedings of the National Academy of Sciences*.

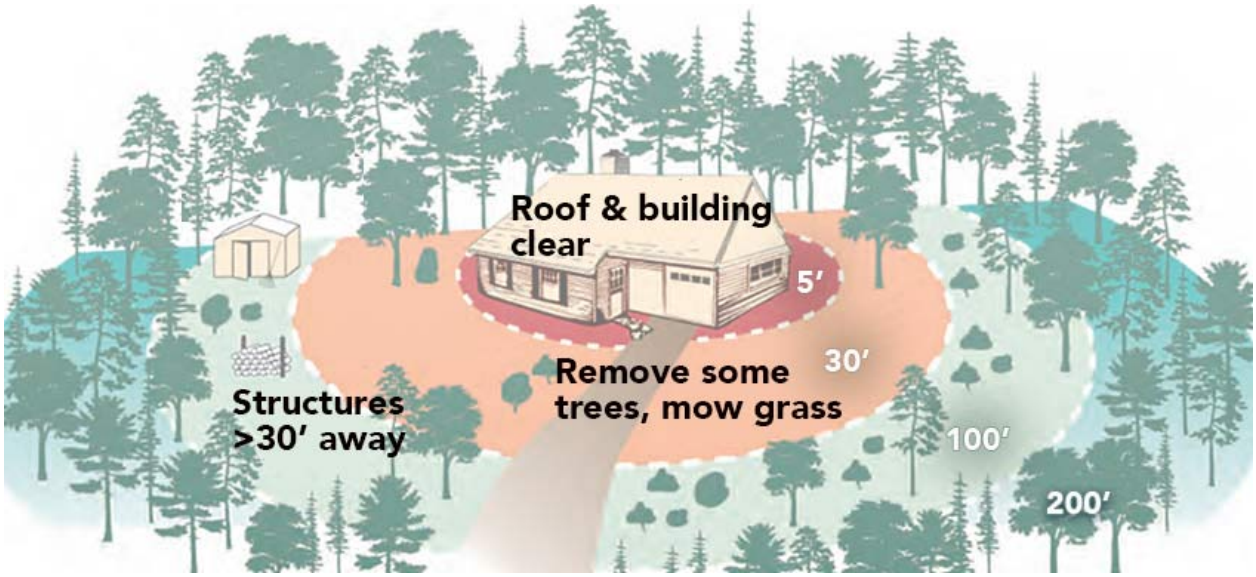
"Lost is the legacy of smaller fires that likely burned outside extreme weather and fuel conditions and resulted in less severe impacts," wrote Michael Dombeck, former chief of the U.S. Forest Service, in *Conservation Biology* in 2004, adding that "projects that reduce fuel

loads but compromise the integrity of soil, water supplies, or watersheds will do more harm than good in the long run."

While fire crews are extremely good at putting out small fires, at 1,000 acres or larger, all bets are off. Large fires cost $1 million per day to fight, and still they don't go out until the wind changes or rain starts to fall, according to a report by the General Accounting Office. Worse, firefighters lose their lives in this uphill battle—an average of 17 deaths per year since 2000. And in light of the wildfire paradox, even fires they do control seem less like victories and more like postponements.

Of course, forest fires do pose a grave threat to people and property within the wildland-urban interface, giving fire managers plenty of incentive to throw everything they have at every fire. But long-term research by Jack Cohen, a researcher with the U.S. Forest Service's Fire Sciences Lab, suggests there are better ways to safeguard houses than taking the fight into the forest.

I tracked down a phone number for Cohen, who had practically vanished after retiring from the fire science lab. (He'd grown frustrated after many years of talking to reporters and policymakers while seeing more and more second homes built in flammable locales.) To my surprise, he returned my call.



Fire scientist Jack Cohen's research on the **Home Ignition Zone** laid the groundwork for safety recommendations for homeowners, like these from the Wisconsin Dept. of Natural Resources. The zone contains three regions: **5 feet:**Keep roof clear of leaves, needles, and other debris. Keep burnable materials from under and around all structures. Siding and decks should be constructed with fire-resistant material. **30 feet:** Remove all but scattered trees and keep grass mowed. **Over 30 feet:** Keep woodpiles and sheds 30 feet from structures. *Illustration from the Wisconsin DNR, used with permission.*

"Bottom line, home ignitions are determined by very, very local conditions," he said. Early in his career, he was puzzled to see houses survive near the edge of a fire, while homes a few blocks farther away burned to the ground. Homes that did burn down often were gone before the fire front even came close to the building. He realized, and subsequently proved in

experiments, that walls of flame aren't what light homes on fire. It's firebrands—burning embers that get lofted on hot air and blown hundreds of yards downwind. These can lodge in a needle-choked gutter or a corner of a wooden deck and smolder for 20 minutes, like a curl of newspaper under a pile of charcoal.

Cohen's research led to the idea of safeguarding the "home ignition zone." He discovered that a set of fairly simple actions in a 100-foot-radius around a home can greatly improve its chance of surviving a forest fire. Homeowners can't stop firebrands from landing on their houses, but they can move their woodpile, clear brush within 60 feet, sweep up fallen pine needles, clean gutters, and make sure they have a nonflammable roof and deck. In a 2000 study, Cohen found that actions such as these would result in a 90% chance of a house remaining unburned during a forest fire.

The work is "pretty much a once a year kind of thing," Cohen says—and much more manageable than trying to keep the entire surrounding forest from burning. In 2014, he and two colleagues advocated for this kind of shift in thinking.

"Wildfires are inevitable," they wrote, in *Proceedings of the National Academy of Sciences,* "but the destruction of homes, ecosystems, and lives is not."

With abundant food, plentiful nest sites, and few predators, burned forests are an ideal habitat for Black-backed Woodpeckers. Black-backed Woodpeckers use burned forests for up to about eight years after a fire. *Photo by Jeremy Roberts/Conservation Media.*

Hutto was tooling through a section of the Rice Ridge burn known as Morrell Creek, driving with his knee while pinching and zooming a fire map on a tablet. We rounded a corner and entered a stand of larger trees with tan splotches running up the black trunks, where flakes of bark had been knocked aside to reveal fresh bark beneath.

Peppering the splotches were dozens of neat, round holes, each one patiently drilled by a woodpecker and leading precisely to the former hiding place of a beetle larva. I tried it myself on a larch, peeling back a section of bark, and found an inch-long jewel beetle larva, still wriggling, with shreds of half-digested bark visible in its guts.

Hutto says the Black-backed Woodpeckers are “As well camouflaged against burned trees as a ptarmigan is in the snow." This male uses the fire-hardened snag to drum and proclaim his territory. *Photo by Jeremy Roberts/Conservation Media.*

Both the male and the female care for the chicks, which fledge after about 24 days. *Photo by Jeremy Roberts/Conservation Media.*

Moments later came a scolding, mewling sound, as if a wren was mugging a cat. That's the Black-backed Woodpecker's giveaway call. A glossy, blue-black male flew in carrying a larva as long as his bill, and dipped his head into his nest hole.

These birds are handsome in a classic, black-will-never-go-out-of-style way. This one had a military bearing with his martial yellow crown, a nearly all-black face with a white slash on the cheek, and fine gray barring on the flanks. He flew off into the black forest and almost disappeared.

"As well camouflaged against burned trees as a ptarmigan is in the snow," as Hutto likes to say.

Over the next hour we watched as male and female took turns carrying larvae to their young. The nest was a classic of the Black-backed Woodpecker style: low—just above head height—in a small, fire-hardened larch. On the lower edge of the nest entrance, the male had chipped out a neat beveled doorstep, now smudged a soft ash-gray from woodpecker tummies squeezing in and out all day. Nesting in such hard wood helps the chicks stay safe from predators such as woodpeckers, jays, bears, and squirrels. (It's even been suggested that their unusual three-toed feet are an adaptation to help them deliver more powerful thwacks of the bill when excavating flame-tempered trees.)

This area was prime real estate. We found an additional two American Three-toed Woodpecker nests within a hundred yards, and watched a female Tree Swallow visit the Black-backed nest. Lacking any excavatory abilities of her own, the swallow was leaning inside to check whether the cavity was free for the taking.

Next to one of the three-toed nests was another blue-flagged tree marking the edge of a salvage-logging plot. Hutto gave half a chuckle.

“That’s what I always say, you want a model of where Black-backed Woodpecker abundance is? Show me your model of where you want to salvage log,” he said. “I bet it’s not that different.”

He paused to clarify: “I’m not against cutting trees. This is not a tree-hugger thing. But let’s just be smart about where we do it.”

Instead of salvage logging, Hutto wants the Forest Service to think about ecotourism, as they already do when they provide maps and permits to morel pickers after fires. “Why not give out maps of where to go see Black-backed Woodpeckers?” he says. “Where’s the most amazing wildflower show you’re ever going to see in your life, and it’s going to be going on for the next 10 years? They ought to be taking out ads in every bird-watching magazine in the country.”

Hutto relishes throwing suggestions out of left field like this, but he acknowledges that forest supervisors have a harder line to walk. “The Lolo [National Forest] is probably the most progressive district in the nation,” he said. “But as soon as a fire burns, those letters are going to start pouring in demanding that you do some logging.”

U.S. Forest Service biologist Victoria Saab stands in an Oregon forest that was salvage logged following the Canyon Creek Fire in 2015. Saab studies whether salvage logging and bird habitat can be compatible in fragile postfire ecosystems. *Photo by Hugh Powell.*

While Hutto approaches fire policy and salvage logging with intensely logical arguments made from an academic remove, scientists in the U.S. Forest Service—such as research wildlife biologist Victoria Saab—have to consider real-world situations.

"Most of the time when a fire happens, salvage logging is considered," Saab says, "so let's try to learn what we can. If I thought it was going to end, I wouldn't have put this study together."

To see Saab's study, I had driven overnight from Montana to the high-desert town of John Day, Oregon, where the 2015 Canyon Creek megafire burned 110,000 acres and destroyed 43 homes, despite the efforts of some 900 firefighters. She's been studying burned forests since 1994, when she became one of the first biologists to examine the effects of salvage logging on birds. Over the course of 11 years, working among 350,000 acres of burned forest in Idaho, she found some bird species did well in salvage logged plots—one of the highest nest densities ever recorded of Lewis's Woodpeckers, for instance. But Black-backed Woodpecker nests were rare in the logged areas, and more than five times more abundant in the intact plots.

Now, Saab is trying to refine that understanding: "We know Black-backed Woodpeckers will persist where you don't have any [salvage] logging," she says. "But can we have some

logging and still have population persistence for Black-backed Woodpeckers?" (Her project is exploring similar questions for Lewis's and White-headed Woodpeckers.)

We were visiting one of the sites in her new study, where she's comparing three differing levels of logging against a control of no logging. Behind Saab loomed a minor mountain of logs that had been cut but never made it to the mill. A Common Nighthawk was buzzing in the sky, and a White-headed Woodpecker was bringing food to a youngster in a single snag left among the stumps.

These are the most fragile moments in fragile ecosystems, and to go in there with heavy machinery and remove logs is probably the most damaging thing you can do.~Tania Schoennagel

In separate discussions, Hutto, Saab, and Schoennagel had each stressed that salvage logging delivers no ecological benefits, just economic ones.

"These are the most fragile moments in fragile ecosystems, and to go in there with heavy machinery and remove logs is probably the most damaging thing you can do," Schoennagel said. "I can see why there might be an economic interest in salvage logging, but there's no argument that can be made that there's an ecological benefit."

"In the short term, it can create habitat for Lewis's that wouldn't be there till later, when trees start falling," Saab said. Fallen trees open up the airspace for these oddball woodpeckers, which do most of their foraging by catching insects in midair. "But eventually [in 10 to 30 years] those conditions would be created by the fire on its own."

Salvage logging doesn't improve the habitat, it just speeds up the disappearance of the burned forest.

Still, the U.S. Forest Service's motto is "Land of Many Uses," and one of the major uses is timber harvest. As long as burned forests are seen as lifeless areas, the monetary return of salvage logging will be an attractive option. In the first couple of years after a burn, salvage-logged timber is just as valuable as green timber, and the large trees can be very valuable. Because dead trees quickly degrade (the work of all those wood-boring beetles), environmental regulations are sometimes waived under emergency orders to speed up the logging process. And very large dead trees, which are far more valuable as wood than smaller trees, aren't always protected by the same regulations that cap the harvest of big live trees.

All told, salvage logging made up only about 11% of all the wood harvested on Forest Service land in the 2018 fiscal year. And all the logging on Forest Service land, burned or unburned, accounts for only about 10% of all the wood logged in the United States each year; the rest comes from private timber lands. If salvage logging is a drop in the bucket, Hutto had asked, back in Montana, then why do it at all?

"A burned forest isn't the first place you should cut, it's the last place," he said. "If it's about wood, let's look at the green forest. There's a billion acres of green forest that's not nearly as special as this forest right here."

Landscapes across the mountainous West are a patchwork of forest types—and in most cases, forest fire is the agent that creates those mosaics. *Section of the Rice Ridge fire, Montana, photo by Jeremy Roberts/Conservation Media.*

While the debates continue over how to handle postfire forests and whether to fight forest fires in the first place, climate change is upping the ante by drying out forests and making fire seasons longer.

"Ten years ago, scientists were very hedgey when talking about climate change," Schoennagel told me. "Now it's front and center." In a 2017 *Proceedings of the National Academy of Sciences* paper, Schoennagel put this idea right into the title: "Adapt to More Wildfire in Western North American Forests as Climate Changes."

The evolution in attitudes is apparent in the *Quadrennial Fire Review*, a joint publication of U.S. Forest Service Fire and Aviation Management and the Department of the Interior Office of Wildland Fire. The most recent one, published in 2015, went so far as to envision a change in philosophy "from war on fire to living with fire."

In the late 1990s, the author climbed fire-killed trees to study the abundant insects that provide a food source for woodpeckers like the Black-backed. *Image courtesy of Hugh Powell.*

The report even suggested, in very polite language, the possibility of adjusting Smokey Bear's attitude. "Core messaging," the report said, "would emphasize that fire is a natural, necessary, and productive occurrence." (Back in 2000, I had briefly tried to promote a new sidekick for Smokey. I called him Smudgy the Black-backed Woodpecker, but he never caught on.)

Additionally, many Western communities have begun to encourage landowners to make their homes more fire resistant, using Cohen's research as a jumping-off point. Two federal initiatives, FireWise and Fire Adapted Communities, help organize these public information campaigns and help homeowners, fire departments, and local authorities work together.

The goal is to get people to understand that they live next to a recurring natural hazard, not too different from living in a beach house during hurricane season. Instead of logging burned forests, why not meet timber needs by thinning the forests around towns and along predetermined evacuation routes, like the ones we already have for people fleeing hurricanes? That's a step that could actually save lives when a crown fire does strike.

From the Canyon Creek burn I drove west to the city of Bend, which sits beneath a trio of 10,000-foot volcanoes known as the Three Sisters, to spend a day off with friends. In this adventure-sports town, we decided to skip all the mountain biking, trail running, sport climbing, river rafting, and fly-fishing to do something really spectacular: go hiking in a forest burned during the 2017 Milli Fire.

We wound lazily up the trail, my friends' Australian shepherd, Taz, running up ahead and coming back to report on the situation. As we gained elevation, we moved out of Douglas-fir and lodgepole pine into a hushed stand of mountain hemlock, burned black but with a shock of red-singed needles still drifting gently onto the forest floor. A Townsend's Solitaire was singing.

Farther still, we emerged onto a hillside of subalpine fir that had burned as severely as anything I've ever seen. This was one of those fully gothic stands, where the trunks are powdery black and the ground is an unrelenting gray.

We were in the Three Sisters Wilderness by now, where logging isn't allowed due to Wilderness Act protections. This was that rare scene in today's outdoors where nothing was the matter. The forest was already pursuing its own course of action. Trees that had spent the last two centuries storing up the energy of the sun were about to turn it all loose again in one great years-long exhale, and push life—beetles, woodpeckers, bluebirds—out of their sturdy bodies one last time.

A bird skittered its nails on the bark of a fir. There was some tentative pecking, and a pause to listen for beetles. A flash of soft, gray-barred flanks, a flash of yellow. Almost too appropriately, it was a Black-backed Woodpecker. It turned its back to me and disappeared.

I thought of Hutto, walking along the road at Rice Ridge, falling silent as he reflected on his 30 years of research in burned forests.

"Basically, it's just a magical place," he had told me. "That's the bottom line."

ATTACHMENT D

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As thousands of Oregon homes burned to rubble last month, the state's politicians joined the timber industry in blaming worsening wildfires on the lack of logging.

Echoing a long-standing belief in the state that public forests are the problem, U.S. Rep. Greg Walden, a Republican who represents eastern Oregon, equated the federal government's management to that of "a slum lord." And Democratic Gov. Kate Brown on "Face the Nation" accused Republicans in the state's Legislature of blocking measures, proposed by a wildfire council, that would have increased logging on public lands.

In the decades since government restrictions reduced logging on federal lands, the timber industry has promoted the idea that private lands are less prone to wildfires, saying that forests thick with trees fuel bigger, more destructive blazes. But an analysis by OPB and ProPublica shows last month's fires burned as intensely on private forests with large-scale logging operations as they did, on average, on federal lands that cut fewer trees.

In fact, private lands that were clear-cut in the past five years, with thousands of trees removed at once, burned slightly hotter than federal lands, on average. On public lands, areas that were logged within the past five years burned with the same intensity as those that hadn't been cut, according to the analysis.

"The belief people have is that somehow or another we can thin our way to low-intensity fire that will be easy to suppress, easy to contain, easy to control. Nothing could be further from the truth," said Jack Cohen, a retired U.S. Forest Service scientist who pioneered research on how homes catch fire.

The timber industry has sought to frame logging as the alternative to catastrophic wildfires through advertising, legislative lobbying and attempts to undermine research that has shown forests burn more severely under industrial management, according to documents obtained by OPB, The Oregonian/OregonLive and ProPublica.

This year's wildfires were among the worst that Oregon has experienced. They destroyed more than 4,000 homes across the state and consumed about 1 million acres of public and private land, nearly double the acreage as in previous years. Extreme winds drove fires across federal forest and industrial timber plantations, down through canyons and into populated areas like Sam Drevo's community of Gates, about 45 minutes east of Salem.

Drevo stepped outside of his home Labor Day evening and saw flames racing across a clear-cut hillside a quarter mile away. He and his mother had time only to grab a bag of clothes before evacuating.

"I'm still kind of spinning. It's hard to believe what just happened," Drevo, a 44-year-old river guide, said. "The devastation of the loss, everything we lost in the house, everything that was sentimental to me. It's just really hard to cope with that."

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Sam Drevo walks through wildfire damage in the town of Gates, Oregon, where he owned a home and river guide business. (Tyler Westfall for OPB)

As fires continue to threaten communities from California to Colorado, state and federal lawmakers have prioritized logging ahead of methods scientists say provide the best chance for limiting damage from wildfires, including prescribed use of fire to clear brush and programs that could help make homes like Drevo's more resistant to wildfire.

"This country has a huge amount of money," Cohen said, noting that annual firefighting costs have surpassed $3 billion nationally. "But if you have a misperception of what the problem is, if you continually define it as a wildfire control problem, then that money largely goes into ineffective kinds of uses."

After last month's fires, the Oregon Forest & Industries Council, a statewide timber lobbying organization, spent thousands of dollars on Facebook advertisements promoting forest management to reduce wildfire risks. Four industry groups, including the council, published an opinion piece calling for the state to unite around logging, thinning and prescribed burns to reduce the buildup of dead and diseased trees on federal lands.

Sara Duncan, spokeswoman for the council, said logging is an effective tool for slowing wildfires. She said that this year's fires, which burned more than 275,000 acres of logged industrial timberland in Western Oregon, should be treated as an outlier because of winds that fueled unanticipated damage.

"In such an extreme event, any land would have burned, managed or not," Duncan said in an email.

The Campaign for Logging

The idea of managing forests to prevent wildfires began gaining popularity in the 1990s, after logging on public lands plummeted following court battles that led to protections for threatened species like the northern spotted owl.

Proponents of more logging have argued that a rise in the number of large fires in recent decades coincided with the slowdown in timber sales on federal lands.

In 2018, the Oregon Forest & Industries Council launched a campaign that featured a simple message: "Managed Forests Do Good Things. Catastrophic Wildfires Do Bad Things." The campaign aims to "build a high-quality, on-line community

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of activists who will advocate for the industry to policymakers and elected officials," according to an internal strategy document obtained by OPB, ProPublica and The Oregonian/Oregonlive.

Over the past decade, 80% of the acres burned in the state have been on federal land, according to data from Oregon's Department of Forestry. The disparity in acres burned is in part because 60% of Oregon forests are managed by the federal government. Most of those forestlands are in drier, remote areas prone to more frequent fire, compared with private forest lands.

Fires on private industrial timberlands can be more quickly suppressed because firefighters have more access through roads, making data that shows the intensity or severity of fires an incomplete metric for damage, industry groups said.

"More important is how the fire spreads and how easy it is to control," Duncan said in an email. "Fires on private forestlands are easier to put out because fuels are more receptive to suppression efforts, and access is maintained through roads."

A stretch of private industrial timberland that burned in the Holiday Farm Fire. (Jes Burns/OPB)

Because the state and federal governments have tried to put out every wildfire for decades, forests that would have been cleared of vegetation by frequent, naturally occurring fires became overgrown. Logging or thinning could provide jobs and wood for local mills, but scientists say it won't prevent destructive wildfires like the ones the state experienced this year.

Logging doesn't eliminate the underbrush, twigs and tree needles that fire feeds on. Removing brush and debris requires fire. That includes "prescribed fire," using drip torches to safely burn across the forest floor during cooler weather.

A forest that is thinned must then be purposely burned to reduce wildfire spread. But in Oregon, more than 1 million acres of federal land have been thinned in the past 10 years, while landscape burning has been completed on less than half that amount, according to data from the Forest Service and Bureau of Land Management.

Homes most often ignite from flying embers, not flames, and research from the U.S. Geological Survey found vegetation levels on public lands were a poor predictor of home destruction in a wildfire.

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Scientists with the U.S. Forest Service and wildfire insurance industry say adapting communities to withstand wildfire by clearing vegetation and using fire-resistant construction like closed eaves, covered vents and double-pane windows provide the best chance to prevent home losses.

In Oregon, neither the state nor federal government track money spent on preventing home ignitions.

Matt Donegan, a former timber investor and consultant who led Brown's Wildfire Response Council, acknowledged thinning may not be effective in the rainy forests of western Oregon because the trees would grow back before wildfire.

Donegan said the damage caused by wildfires this year, which was almost entirely on the west side of the state, will likely prompt a special legislative session. He expects a debate over how much state funding should go toward fireproofing private residences.

"I think one of the most vexing topics Oregon will face is what do you do with the west side forests?" Donegan said. Wildfire there is "not going to happen often but when it does, my heavens, the impacts are so great."

The governor's wildfire council put forth a set of recommendations this year that

included increasing the state's firefighting capacity, creating a buffer around homes and requiring electric companies to shut down power lines during high winds.

The council's most expensive recommendation called for the state to spend $4 billion over the next 20 years on forest management, primarily on thinning. Funding for the proposal would have covered fewer than half of the total acres in Oregon considered at high risk of wildfire.

The cost estimate didn't include maintenance treatments of prescribed fire, which the council acknowledged are "essential for maintaining risk reduction over time."

"Researchers and Their BS Study"

About an hour east of Eugene in a patchwork of heavily managed public and private timberland, with hundreds of acres of clear-cutting and thinning in every direction, the community of Blue River was completely leveled by September's 173,000-acre Holiday Farm Fire.

Picking through the burned husks of buildings and cars, researcher Chris Dunn pointed to a nearby hillside that had been logged before the fire.

"That kind of management clearly didn't provide community protection," said Dunn, who spent eight years as a wildland firefighter. He now studies fire behavior and risk for Oregon State University and the Forest Service.

In 2018, Dunn co-authored a study with Humboldt State University's Harold Zald that found the 2013 Douglas Complex Fire in southern Oregon burned 30% more severely on private industrial timber plantations than on federal forestlands.

Dunn said the research wasn't intended to target the timber industry. It was meant to explain why the fire burned in a particular pattern. He thought perhaps industry leaders might use the study to push for better fire protection funding for their lands, which provide society's wood supply and could be susceptible to burning.

But the findings challenged a report by the Oregon Forest Resources Institute, a tax-funded forest education agency overseen by timber companies. The institute's report had pointed to the same fire to caution that unlogged public lands contributed to damage on private lands.

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"While the study is not receiving attention, enviros are using it, and it is out there as a matter of record," then-director Paul Barnum wrote to staff in 2018 in an email obtained by The Oregonian/Oregonlive, OPB and ProPublica. "Without someone challenging the study, those accessing it in the future may assume it's legit."

Barnum declined to answer specific questions about the study by Dunn and Zald. He said his emails were not relevant to this year's fires.

The institute drafted a guest opinion refuting the study and sought input from industry groups before submitting it to a local newspaper.

"From beginning to end I would keep the focus on these two specific researchers and their BS study," advised Nick Smith, a lobbyist for the national timber group American Forest Resources Council.

In response to emailed questions, Smith said he took issue with the researchers' "broad policy conclusions" and thought the study didn't contribute much to the protection of forest values or communities.

The institute's opinion piece ran nearly two months after the study was published, under the heading "Replanted forests don't increase intensity of wildfire."

Dunn said no one from the industry reached out to him before criticizing his findings.

"Why wouldn't someone just email me and ask me about it and talk," Dunn said. "It's like creating a false perception of me being against them or them being against me, and that's completely incorrect."

Land Managed, Homes Lost

Days after the September fires wreaked havoc in Oregon communities, Congress had a hearing on a comprehensive wildfire bill.

In the Senate, Democrat Dianne Feinstein of California and Republican Steve Daines of Montana introduced a wildfire bill focused primarily on expanding logging. The bill, which also includes prescribed burning and funding for home construction, would provide additional exemptions on environmental and legal reviews for logging to help mitigate wildfire.

Logging didn't help Drevo's community of Gates. Five of the nine houses on his street survived because they were built to be fire resistant or their owners doused them with sprinklers during the blaze. Drevo, who didn't learn he could fortify his home until it burned down, said politicians should focus on making communities more fire-resistant.

"You look at what happened in my little microcosm," Drevo said, "and the fact that there was an area that was heavily logged, and it was a huge inferno that helped add to the destruction of our community."

Late last year, Sen. Kamala Harris, a California Democrat and her party's nominee for vice president, sponsored a bill to create a $1 billion grant program for making homes more resistant to wildfires. Oregon Democratic Sen. Ron Wyden co-sponsored the bill in September. He also filed a separate bill seeking a $300 million federal investment in the use of prescribed fire.

Neither bill has received a hearing.

Jes Burns of OPB and Rob Davis of The Oregonian/Oregonlive contributed reporting.

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Available at https://mountaintownnews.net/2020/11/02/troublesome-fire/ (last accessed Dec. 11, 2020)

Colorado's Troublesome megafire

November 2, 2020 by Allen Best

Troublesome questions about where we're headed during our hotter, drier, longer summers in Colorado

by Allen Best/Top photo by Brad White

East Troublesome, now the second largest fire in Colorado as defined by acreage, appears to have started on Oct. 14 within a mile or so of my first backpack trip 40 years ago.

My days of backpacking have ended. These very large, very strange fires such as East Troublesome will almost certainly become more common in coming decades. For about a decade, wildfire specialists have been using a new word to describe those of another dimension: megafires. Colorado this year has had

three wildfires that crossed the threshold of the simplest metric, 100,000 acres in size.

East Troublesome hurtled past that metric in less than 90 minutes. Like at least one other fire, it appears to have created its own weather. And then there's the weirdness of the timing. It started in mid-October, traditionally a time of down comforters and, if not every year, most years in the mountains, snow on the ground.

The largest fire in Colorado history is now the Cameron Peak Fire. It started Aug. 15 and has now reached 209,000 acres. The East Troublesome Fire is second at 194,000 acres. Both remain lives fires. The third largest fire, Pine Gulch, north of Grand Junction, also occurred this year, covering 139,000 acres before being declared completely contained in September. Partly in Colorado, but mostly in Wyoming, is the Mullen Fire, at 177,000 acres.

Smoke from the Mullen Fire along the Wyoming-Colorado border as seen from the Snowy Range in Wyoming on Oct. 6. *Photo/Allen Best*

But first, about that backpack trip. In 1980, I was living in Kremmling, a small town with a blue collar and cowboy boots. The busiest bar was called the Hoof 'n' Horn. Most people worked at the Edwards Hines sawmill, one of several sawmills

in the region, or at the Amax Henderson molybdenum mill, which was “up” the Williams Fork Valley 25 miles away.

About backpacking, I knew nothing. My equipment was laughable, more suitable for a city park than a stretch of country rarely visited by people except cowboys during roundup time. A girlfriend drove me up Colorado 125, the road between Granby and Walden, and then onto a Forest Service road, and dropped me off.

It rained hard that night, lightning crashing fiercely, and there were bumps in the night, probably cattle and maybe elk, but I thought for sure bears. Then the sun came up. I had caught the bug. Exploring places beyond the roads became a passion. A decade later I had become an avid backpacker and a pretty good backcountry skier, too.

The East Troublesome fire started Oct. 14 and would have been a record fire in the 20th century and, by 21st century standards it was still respectably large. But in the dull, gray sky along Front Range, it was indistinct from the smoke of the Cameron Peak Fire and then the fire near Boulder called CalWood.

We had watched the CalWood fire that Saturday evening from a restaurant in Boulder, the last one along Broadway before it joins Highway 36. The fire had started about seven hours before and was already, I believe, the largest in Boulder County history. Sitting outside at the restaurant, we could see the fire flaring in the distance, maybe 10 miles away. I didn’t realize how personal it was to people in the next socially distanced table until later. Cathy, my companion, who still has good hearing, said they were people who had homes in the fire area. One was calling his insurance agent.

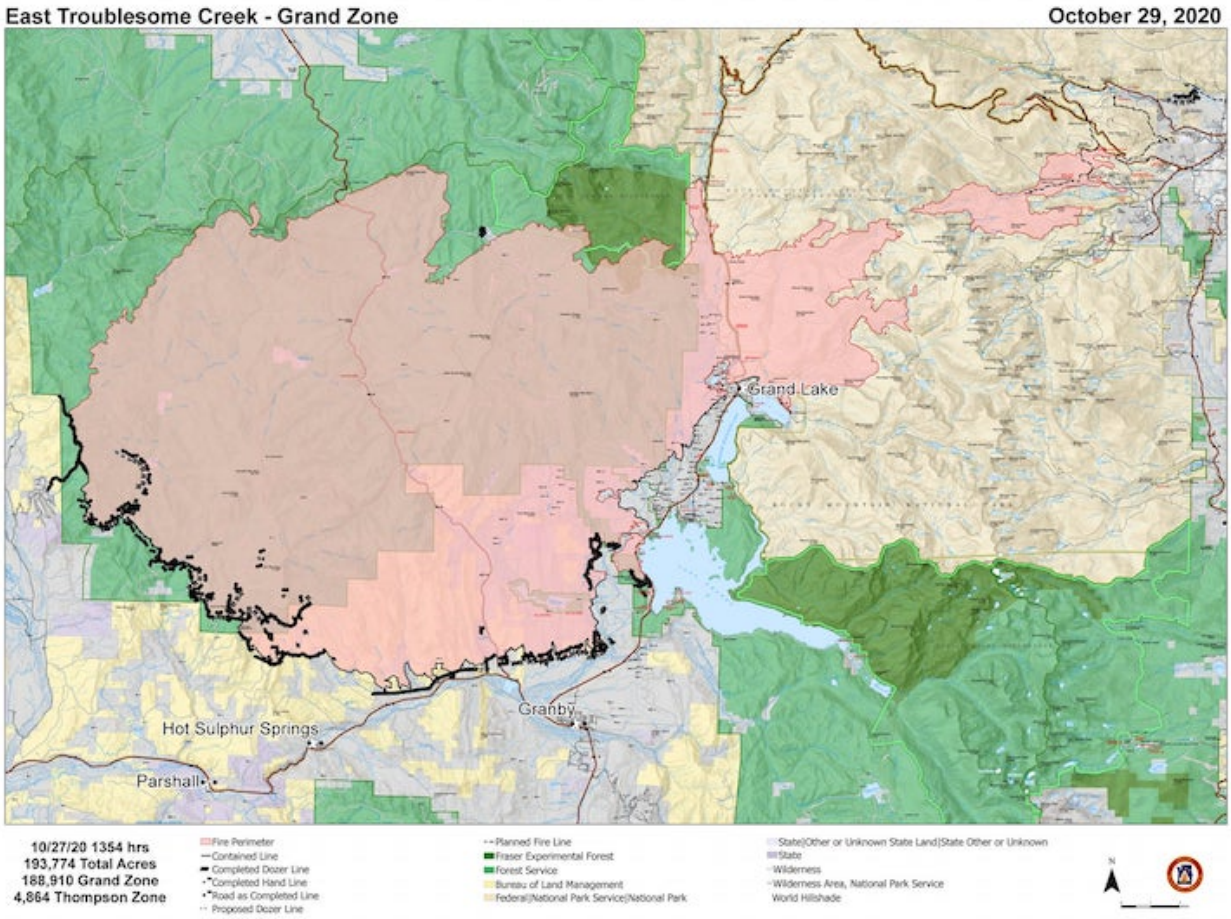
Like a volcanic eruption

On Oct. 21, a week to the day after East Troublesome had started, I saw a Facebook post showing a giant plume of smoke as seen from Park Meadows, in Denver’s South Metro area. I assumed one of these Front Range fires had blown up. It had been another unseasonably warm day. The person who posted the photo compared it to Mt. Vesuvius erupting.

Later, the story has been pieced together. The fire had advanced to northeast of Hot Sulphur Springs but still east of Colorado 125, the highway that goes from Windy Gap—west of Granby a few miles—north to Willow Creek Pass and to Walden.

Brad White, the fire chief for Grand County Fire Protection District No. 1, whose service territory includes most of the affected area other than Grand Lake, says the fire made a run toward evening, as the sun was getting low in the sky. The fire had been burning a mixture of live and dead trees in the Kinney Creek area northeast of Hot Sulphur Springs. In 90 minutes, pushed by winds from the southwest, the fire rushed to Rocky Mountain National Park and across Trail Ridge Road. By White's calculation, that's a distance of 17 miles.

Slow-burning fires spread by the ground, often from tree crown to tree crown. This fire, during its runs, leaped great distances, a process called spotting. Visiting the charred remains of Columbine Lake, a housing development west of Grand Lake, White and others found a burning fist-sized ember—a piece of burning tree that they believe was hurled into the sky and came down miles away, like hail.

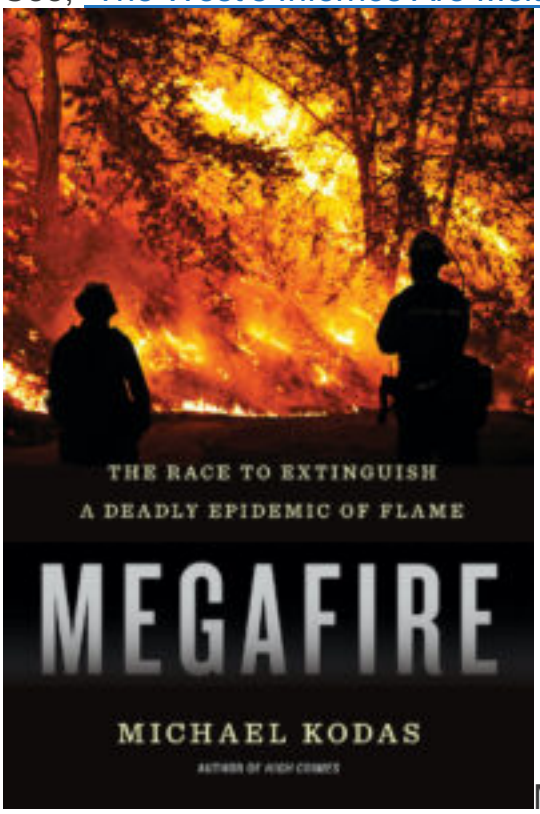


The East Troublesome fire was large by conventional Colorado standards, having covered a large area north of Hot Sulphur Springs. Then, in one evening it sprinted past Grand Lake and across the Continental Divide.

The current issue of Wired magazine tells of something similar, but set in Redding, Calif. An employee of the Forest Service, Eric Knapp, barely escaped a fire alive. The assumption he had made was that the fire would spread in typical fashion, on the ground. It instead created a giant column of fire and smoke, like a tornado, and then spread ashes and embers. That is what nearly killed the Forest Service fire expert and many of his neighbors. It sounds like something similar happened with the East Troublesome fire.

A key paragraph from that story:

“Knapp knew this could signal a once rare and dangerous phenomenon known as plume-driven fire, in which a fire’s own convective column of rising heat becomes hot enough and big enough to redirect wind and weather in ways that can make the fire burn much hotter and, with little warning, spread fast enough to trap people as they flee.”
See, “The West’s Infernos Are Melting Our Sense of How Fire Works.”



Michael Kodas, the Boulder-based author of a 2017 book called “Megafire,” says Cameron Peak, East Troublesome and Pine Gulch fires all produced what are called pyrocumulus clouds, basically thunderheads. In the case of Pine Gulch, it produced lightning. Lightning from such smoke-born clouds can make the fire worse or spread it.
So far, though, Colorado has escaped what has now been observed in California: tornadoes caused by wildfires. They’ve been nicknamed firenadoes.

But the East Troublesome fire had enough wind to sprint hard across Grand County. I heard statements about hurricane-type winds capable of forcing cars off roads. Another report from a second-hand source was of “pine cones on fire blowing in the wind that were like missiles in the air.”

White’s estimate bears repeating: This fire ran 17 miles in 90 minutes. And 105,000 acres in an evening. To put that into perspective, Colorado’s largest forest fire until 2020 was the Hayman Fire of 2002, which covered 138,000 acres. It’s largest single-day run was 60,000 acres.
The Troublesome fire got big and did so fast in a month when fires are rare. It also leaped across the Continental Divide. In some areas, where the Continental Divide in Colorado is forested and relatively low, that wouldn’t be all that notable. But in this case it leaped across two miles of rock and tundra to start a fire that quickly forced the evacuation of the east side of Estes Park, including the downtown area, and eventually the entire valley. In published reports, firefighting experts described it as so rare as to cause head-scratching.

It may have created its own weather, as big fires can do. Some anecdotal reports gleaned second-hand describe intense winds. From Fraser, about 30 miles to the south, Andy Miller, with whom I worked almost 40 years ago at the now-defunct Winter Park Manifest, said he saw tall columns of smoke, thunderhead-type formations. Atop this cloud of smoke were lenticulars, which commonly are at 40,000 feet.

On the outskirts of Granby, Patrick Brower and his wife and children had packed their car that Wednesday. The town was under a pre-evacuation order, but some areas on the mesa north of the high school were ordered to evacuate. That afternoon, there had been a steady stream of evacuees flowing through Granby—people from Grand Lake and the Three Lakes area—driving by his former office at the Sky-Hi News. Police did a good job of getting people out of harm’s way, he says, just as they had in Granby in 2004.

“It was scary for sure, because there were massive, massive clouds of smoke,” he says. “But the fire was still west and north of Granby.”

Brower has a habit of sticking around until the last minute. In 2004, when he was still editor and publisher of the newspaper, Brower fled through the back door of the newspaper office just as the bulldozer of the small-town terrorist Marvin Heemeyer crashed through the front door.

Heemeyer nursed his grudges against the world in Grand Lake, the town of knotty-pine-sided buildings at the entrance to Rocky Mountain National Park. It mostly escaped the fire.

Despite the greenery evident in the foreground of this photo, there was a stench all around such as being amid 10,000 smoldering campfires. ***Photo/Allen Best***

On Saturday, 11 days after East Troublesome made its big run, I drove to Granby and then Grand Lake. An electric sign at the entrance said, “Locals only please.” My companion and I instead followed Highway 34 to the blockade at the entrance to Rocky Mountain National Park. In the background of Grand Lake were giant hillsides of charred, dead trees. Immediately along the highway, only a few areas had burned. Nearly all the houses remained standing. The Grand County Sheriff reported 300 houses wee lost, not counting outbuildings. I suspect considerable luck. Easily, hundreds of houses could have burned if the wind had been in a slightly different direction.

Munching on our ham sandwiches, the car windows open, because it was warm, almost hot, we smelled the stench, the stink of being in a landscape of 10,000 campfires. It became unpleasant, almost sickening. We wondered what it would be like to live amid that strench for days, even weeks.

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This is from the Nov. 2, 2020, issue of Big Pivots. To join the mailing list go to BigPivots.com

President Trump famously blamed environmentalists in the case of California's fires this summer with his comment that "you gotta clean your floors, you gotta clean the forest." The general grievance that I heard in Trump comments was that it's those darned environmentalists wanting nature pure and pristine. If only the logging industry were allowed to get out the harvest.

In fact, sawmills in Colorado during the 20th century did cut a lot of wood. The mill in Kremmling when I was there ran 12 to 14 million board-feet a year. When Louisiana-Pacific came in, it did 20 million board feet. I assume the mill in Walden had some comparable numbers to the earlier Kremmling mill. These mills would mostly have had access to the wood on national forest lands in the East Troublesome fire area.

Then came the beetle epidemic. There had been a fairly significant epidemic in the lodgepole pine that dominates that country in the early 1980s. Then, in 1996, a much, much bigger epidemic, first along Keyser Creek, near the molybdenum mill where I had once worked, then spreading outward: the Fraser Valley and Winter Park, Grand Lake, Summit County and Vail, Steamboat Springs and along I-70 near the Eisenhower Tunnel.

Some of this wood has been harvested, such as for wood pellets at a new mill in Kremmling. More in recent years has been used to produce electricity at a plant at Gypsum.

Mostly it was left standing or it fell down. The economics of wood in Colorado just aren't that good. To make electricity, for example, requires a subsidy. Even so, it makes no sense to haul the wood more than 70 miles. And the dimensional timber from Colorado's mostly scrawny lodgepole pine just isn't worth that much. Bigger trees in the Pacific Northwest and British Columbia, that's where the money is. As for the beetle killed trees, they begin twisting and cracking fairly soon after they've died.

Suppressed fires

A century of fire suppression also mattered. Fires had been big in the 19th century in Colorado. There were big fires in the 1850s and then again in 1878. The latter fires were attributed to Ute Indians and were called spite fires. Maybe, maybe not. Better authenticated are the fires set by prospectors to study the rock outcrops more easily. We do know that Vail's famous Back Bowls lost their trees in 1878.

This federal policy of fire suppression in landscapes that are fire prone has been written about often, and in various ways. In “The Big Burn,” Timothy Egan wrote about the fire in northern Idaho that covered three million acres in 1910 and triggered the fire-suppression policy in the new federal agency created to manage the forest reserves. In his delightful novel “English Creek,” Ivan Doig created a central figure who was dogged by a disquieting past that never comes out until late in the book. He had, we learned, let a fire get out of hand.

The East Troublesome fire burned to the shores of Granby Reservoir in one or two places but more generally had a northeasterly trajectory. ***Photo/Allen Best***

In 1988, by which time I was in Vail, the harm of fire suppression had become apparent. That was the year that Yellowstone was “lost.” But – the ecologists insisted – fire is natural in forests, even if the scale in Yellowstone was mind boggling: 1.2 million acres. Colorado that summer was smoked up by the I Do fire west of Craig, named because a firefighter got married the day lightning caused the fire. It covered 15,000 acres. At the time, it was Colorado’s record.

In Vail in the 1990s, the Forest Service tried to reintroduce fire to improve game habitat. There was bitter opposition, although fire did occur after I left. Trees were cut, mostly with more thought to aesthetics and biology, along Red Sandstone Road north of Vail and in the Buffehr Creek area. And swathes of forest on the south—think ski mountain—side of Vail were thinned of wood in the first decade

of this century after the big drought, the big fires of 2002, and the bark beetle left forests red and then needle-less.

In Summit County, the pivot may have been even greater. I greatly oversimplify here, but think of public policy that went from thou-shalt-cut-no-trees to thou-shalt-cut-trees.

Climate change matters, too—immensely so. During my years in Kremmling, it routinely got to 20 and 30 below. Most memorable was the January morning in 1979 when the thermometer at the Phillips 66 gas station next to where I lived registered 62 below. That wasn't an official record temperature, but it's as cold as it gets on Colorado's record books. Nowadays, In Fraser, the self-described "icebox of the nation," it got to 14 below last week. During mid-winter it can get to 30 below. But that's not routine, like in the good, cold days.

Then add to that warming trend this year's exceptional heat. It wasn't particularly a dry winter at the headwaters of the Colorado River where the East Troublesome fire began. But spring came early, and summer turned hot.

Many homes along Highway 34 and west of Granby Reservoir were spared, perhaps the result of the luck of winds. ***Photo/Allen Best***

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This August was the driest and hottest on record in much of Colorado. By mid-month, several fires were raging: The Williams Fork fire began almost precisely at the epicenter of the bark beetle epidemic from 1996, near where I had worked during that year of my first backpack trip. There was Grizzly Creek above Glenwood Canyon, which shut down Interstate 70 for two weeks, causing bumper-to-bumper traffic across South Park as people took the long, long detour through Gunnison to get to Denver. But after a a snowstorm in early September, it got hot again. I was in the Steamboat area a few days before that East Troublesome fire began, and it had been 85 degrees at an elevation of almost 8,000 feet. Yikes.

The current issue of Foreign Affairs has an article by Michal Oppenheimer of Princeton University titled: "As the World Burns: Climate Change's Dangerous Next Phase." He talked about wildfires and cyclones, disparate, but alike in important ways, and increasingly common:
"Soon, some once-in-a-lifetime catastrophes will become annual debacles. As temperatures rise, the odds that such events will occur at any specific location in a given year are growing quickly, particularly in coastal areas," wrote Oppenheimer. He went on to make the case for adaptation getting equal billing with mitigation.

Bruce Finley, writing in The Denver Post, riffed on the same theme of accelerating impacts of climate change. The headline was: As Colorado wildfires burn, fears that climate change is causing "multi-level emergency" mount.

A heavy wool blanket

Megafires—including 2020's Cameron Peak, East Troublesome, and Pine Gulch—are burning hotter and longer, with record destruction this year of 700,000 acres in Colorado and 6 million acres around the West. The smoke that exposed tens of millions of people to heavy particulates, health researchers say, will pose an even greater risk to public health in years to come.

The U.S. Interagency Fire Center defines a megafire by its size: more than 100,000 acres. By that count, Colorado has had three alone this year after having just one before in 2002.

Kodas, the "Megafire" author, dislikes a simple metric of size in deciding when to apply mega to a fire. Impacts also matter, and by that measure none of this year's fires caused near as much damage as those along the Front Range in years past: Waldo Canyon at Colorado Springs, Four Mile west of Boulder and High Park west of Fort Collins.
Colorado, he agrees, has entered a new era of wildfires: a time of larger fires more resistant to suppression and fires outside what has typically been

considered wildfire season. In this, Colorado has company with California but also other parts of the world, he says. Next year may not be as bad as this year. Every year won't look the same. But the trend is clear.

There's also something else, as was hinted by the October fire near Boulder.

"We will see bigger fires and I think we will also see fires closer to and more threatening to our infrastructure, our communities, our homes," he says. "That's when these fires will really become mega."

Fires, some of them very big, have always been a part of our ecosystems. In the early 1600s, for example, there was a giant, stand-replacing fire in the Fraser Valley. But in the 20th century, it was still possible to describe the high-elevation forests on the Western Slope as "asbestos forests," the threat of fire was so remote. We've lost that illusion. Now we have the unnatural created by accumulating greenhouse gases like a heavy wool blanket on top of what is natural.

In 1980, during my first backpack trip, the accumulation of greenhouse gases measured at Mauna Loa stood at 338 parts per million. This year we hit 411 ppm. East Troublesome, foremost among the several giant fires in Colorado during 2020, tells me we've entered a new era. Call it a Big Pivot.

ATTACHMENT E

From: **Marla Fox** mfox@wildearthguardians.org
Subject: Fwd: Comment on Bug Creek Project EA - WildEarth Guardians
Date: December 11, 2020 at 12:52 PM
To: Keith Hammer keith@swanview.org, Arlene Montgomery arlene@wildswan.org, Adam Rissien arissien@wildearthguardians.org

MF

FYI

---------- Forwarded message ---------
From: **Marla Fox** <mfox@wildearthguardians.org>
Date: Fri, Dec 11, 2020 at 11:36 AM
Subject: Comment on Bug Creek Project EA - WildEarth Guardians
To: <comments-northern-flathead-swan-lake@usda.gov>

Hello,

Attached please find a comment from WildEarth Guardians on the Bug Creek Project.

Best,
Marla Fox

--

WildEarth GUARDIANS
A FORCE FOR NATURE

MARLA FOX, JD
STAFF ATTORNEY

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STAFF ATTORNEY

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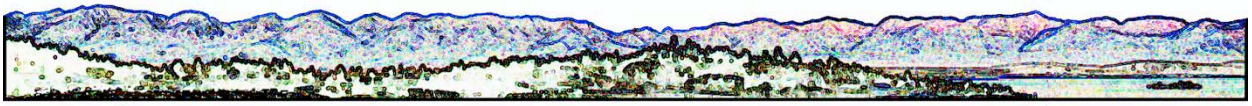
651-434-7737
Follow @wildearthguard

WildEarth Guardians | PO Box 13086 | Portland, OR 97213
www.wildearthguardians.org

2020 12 11 WildEarth Guardians …eek EA.pdf

ATTACHMENT F

Swan View Coalition *Nature and Human Nature on the Same Path*



3165 Foothill Road, Kalispell, MT 59901 swanview.org & swanrange.org ph/fax 406-755-1379

December 29, 2020

Chris Dowling - District Ranger
Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911

Re: Supplemental Comments on Bug Creek Project EA
Submitted as PDF to comments-northern-flathead-swan-lake@fs.fed.us

Dear Mr. Dowling;

Since submitting our 12/14/20 comments on the Bug Creek EA, we've had a chance to gather further information about the unauthorized placement, construction and maintenance of mountain bike trails in the project area. We included on page 9 of our prior comments a map of some of these trails downloaded from Pinkbike.com, followed by our discussion of how the EA makes no attempt to describe how it will reduce this trail system on-the-ground after letting it run rampant for over a decade.

See Attachment 1 for a 12/16/20 screen-shot of the Crane Mountain mountain bike trails on Trailforks.com, which is managed by Pinkbike.com.

See Attachment 2 for the details on the "Enchanted Forest" trail, which simultaneously lists the Forest Service among the "trail supporters, builders and maintainers" while noting in red type "This trail is unsanctioned, use at your own risk!"

See Attachment 3 for the details on the "Fire Line View" trail, which simultaneously lists the Forest Service among the "trail supporters, builders and maintainers" while noting in red type "This trail is unsanctioned, use at your own risk!"

See Attachment 4 for the details on the "Smokejumper" trail, which simultaneously lists the Forest Service among the "trail supporters, builders and maintainers" while noting in red type "This trail is unsanctioned, use at your own risk!" The detail also notes this trail has been established on "a practice fire line."

See Attachment 5 for the details on the "Top Hat" trail, which simultaneously lists the Forest Service among the "trail supporters, builders and maintainers" while noting in red type "This trail is unsanctioned, use at your own risk!"

See Attachment 6 for the details on the "Original Sin" trail, which simultaneously lists the Forest Service among the "trail supporters, builders and maintainers" while noting in red type "This trail is unsanctioned, use at your own risk!"

The above attachments are just a few examples of "unsanctioned" trails bearing the Forest Service logo on Trailforks.com and are limited to the project area. How can this unauthorized trail network have developed when 36 CFR 261.10(a) clearly prohibits it, especially when one of the primary Crane Mountain bike proponents was cited and fined for "constructing, placing, or maintaining any kind of trail or other improvement on National Forest System lands without authorization" in the project area?

Simply put, the unauthorized activity has not stopped, continues to date on Crane Mountain, in Krause Basin and elsewhere, and the Forest Service has never legally closed the unauthorized routes to public use. The Bug Creek EA must clearly describe how the current situation developed, what steps the Forest Service will take to effectively close unauthorized routes not designated as part of the trail system, and why the public should believe the steps described will be effective.

Many mountain bike proponents are under the mistaken belief that they are not violating 36 CFR 261.10(a) if they only clear brush and trees to create or maintain unauthorized trails, provided they don't move dirt. This issue was resolved in Swan *View Coalition v. U.S. Forest Service* (CV 99-9-M-DWM) in 1999, in the matter of a snowmobile trail having been cleared through Krause Basin without Forest Service authorization and in violation of 36 CFR 261.10(a).

In a 2/12/99 Hearing on Temporary Restraining Order, then District Ranger Chuck Harris agreed on cross-examination that the cutting of brush was illegal, that the brushing facilitated increased use of the trail, and that the clearing of the snowmobile trail could also facilitate use during the summer when he "would have major concern because of the sensitivity of the soils and possible erosion." (Hearing Transcript, pages 154-164). After Judge Molloy ruled plaintiffs were likely to prevail on the merits, the government chose to settle the case. The unauthorized trail was legally and physically closed using earth berms and downed trees.

Please revisit our 12/14/20 letter and photos regarding Crane Mountain, showing that mountain bikes on unauthorized trails are causing significant erosion, not just motorized vehicles. The Bug Creek EA must clearly describe the criteria by which each of the unauthorized trails is being designated a system trail and the criteria by which new trails are being designated as system trails in order to minimize erosion, impacts on vegetation, impacts on wildlife, impacts on other forest users, impacts to human health and safety, and impacts on other resources.

We've submitted these comments in as timely a manner as possible, given we had to firstly secure unauthorized trail information that was not provided in the EA to be commented on. We ask that these comments be responded to in the revised EA/EIS and/or draft Decision Notice/Record of Decision.

Thank you for your attention to these matters.

Sincerely,

Keith J. Hammer
Chair

Attachments 1-6

Bigfork, Montana Mountain Bik

trailforks.com/region/bigfork/?activitytype=1&z=12.8&lat=48.00704&lon=-114.00336

TRAILFORKS | Mountain Bike | Search for Trails, Regions, etc. | search

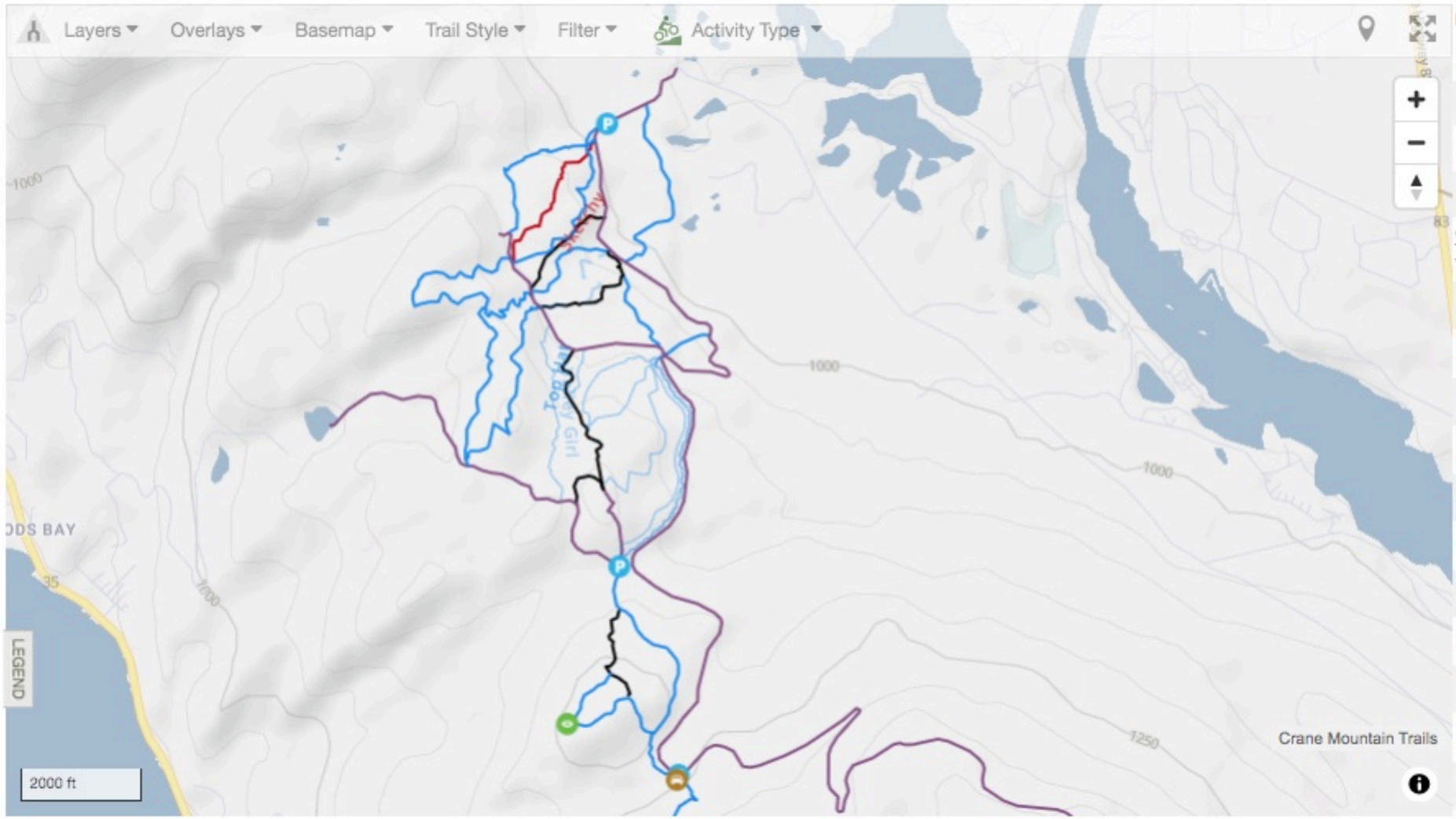
Nearby | Trails | Routes | Reports | Parks | Ride Log | Events | Apps | More | Get Trailforks PRO

United States » Montana » Flathead Valley » Bigfork

Bigfork Mountain Biking Trails / city region

Overview | Areas | Trails | Routes | Status | Reports | Photos | Videos | Events | Ride Logs | Route Planner | More | Add / Edit

Layers | Overlays | Basemap | Trail Style | Filter | Activity Type



Popular Routes

- 2018 Tour Divide Route
- Great Divide North bo..
- Great Divide North Bo..
- Great Divide Mountain..

view more routes »

Trails

- Access Trail
- Cedar Run
- Cirno
- Crane Mountain Ro..
- Crevice
- Dale Jorgenson Co..
- Deep Do-Do
- Direct Flight
- East Fireline
- Enchanted Forest
- Estes Lake

Attachment 2 ATTACHMENT F

TRAILFORKS Mountain Bike Search for Trails, Regions, etc. search

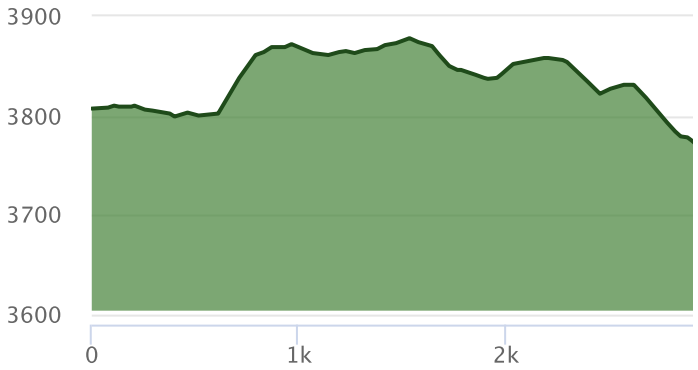
Nearby Trails Routes Reports Parks Ride Log Events Apps More Get Trailforks PRO

United States » Montana » Flathead Valley » Bigfork » Crane Mountain Trails

Enchanted Forest / mountain bike trail

Overview Photos (3) Videos (0) Reports (8) Comments (2) 3D Tour Leaderboard Ridelogs Stats Add / Edit

4,640 ft	174 ft	-378 ft	00:32:26
Distance	Climb	Descent	Avg time



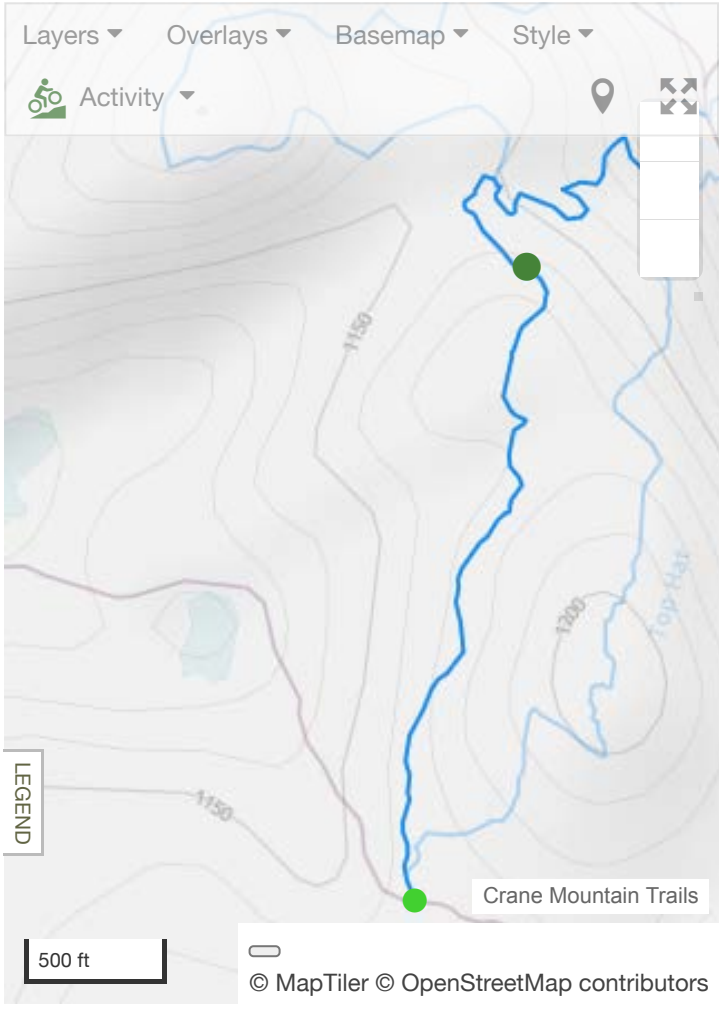
Status: Avg: 3.5 (2 votes)

on Nov 2, 2020

Wet

ridden check-in sav

view (13)



Directions to enchanted-forest-20209 trailhead (48.004560, -114.020800)

Trail Supporters, Builders & Maintainers of Enchanted Forest Trail

USFS
Land Manager

Enchanted Forest Details

No

Activities:	Mountain Bike
Riding Area:	Crane Mountain Trails Bigfork, Montana
Difficulty Rating:	Blue rate
Trail Type:	Singletrack
Bike Type:	DH, AM, Fat
Trail Usage:	Biking Only

Attachment 2 ATTACHMENT F

Direction:	Downhill Primary Popular direction shown
Climb Difficulty:	Blue
Physical Rating:	Moderate
Dogs Allowed:	Yes
Global Ranking:	#33813 in Mountain Biking
Local Popularity:	50 in Mountain Biking
Year Opened:	2009

description for Enchanted Forest trail has been added yet! Submit one here.

Enchanted Forest is a 4,640 ft moderately popular blue singletrack trail located near Bigfork Montana. This mountain bike only trail can be used downhill primary and has a moderate overall physical rating with a 174 ft blue climb. On average it takes 32 minutes to complete this trail.

Access Info

Trail is accessed off of the Estes Lake trail #96

This trail is unsanctioned, use at your own risk!

More Stats for Enchanted Forest mountain bike trail trail

Altitude change:	-204 ft	Altitude end:	3,603 ft	Distance climb:	1,671 ft
Altitude min:	3,603 ft	Grade:	-4.399	Distance down:	2,570 ft
Altitude max:	3,878 ft	Grade max:	-32.14	Distance flat:	399 ft
Altitude start:	3,807 ft	Grade min:	35.284	Avg time:	00:32:2

view trail stats

Enchanted Forest

update trails status or condition

Trail Reports

Nov 2, 2020	Trail is un-ride able. Trees down	
Aug 4, 2020	Unrideable and easy to lose without this app. Needs quite a bit of work.	
Aug 3, 2020	Trail has not been used in quite awhile. Very much overgrown; hard to see where the trail continued. I end up hike-a-bike more than riding.	
Feb 28, 2017	REPORTER	This trail has been cleared of most downfall but can be hard to follow in spots because of the brush cover.
Nov 30, 2016	REPORTER	

view all reports »

Recent Ridelog Activity on Trail

Past Week	6 Months	All
0 rides	**2** rides **5 miles** avg distance	**13** rides

Photos

more »

Videos

no videos have been added for Enchanted Forest yet, add a video.

Nearby Trails Crane Mount…

Attachment 2

ATTACHMENT F

- Top Hat 171 ft
- Valley Girl 2,608 ft
- Original Sin 3,005 ft
- Snivel 3,215 ft
- Cirno 3,278 ft

Crane Mountain Trails Trails
Crane Mountain Trails Trail Map
Crane Mountain Trails Trail Reports

50 | Jun 3, 2017

56 | Jun 3, 2017

59 | Jun 3, 2017

Local Weather

Bigfork

16th Wed

41°F - 41°F
humidity: 77
sunset: 4:43 pm

17th Thu

33°F - 37°F

18th Fri

33°F - 37°F

19th Sat

35°F - 39°F

2 Reviews & Comments

Score Time

tickvball (May 29, 2017 at 8:38) + 0

Not really a ridable trail right now. Overgrown and needs to be cleared. Pink tags show you the way but it's mostly hike a bike until the last 1/4 mile. Good potential just needs some work.

[Reply]

coylesy (Sep 3, 2018 at 17:29) + 0

Too overgrown to ride

[Reply]

Post a Comment

Submit

Share Tweet Pin

embed Enchanted Forest trail on your website

Updated on Thu 2017-05-04 @ 3:35pm
Submitted on Mon 2014-11-03 @ 12:47pm
#20209 - 895 views

subscribe add to favorites flag

download

[edit] [activity log for enchanted forest mountain bike trail trail]

Attachment 2

ATTACHMENT F

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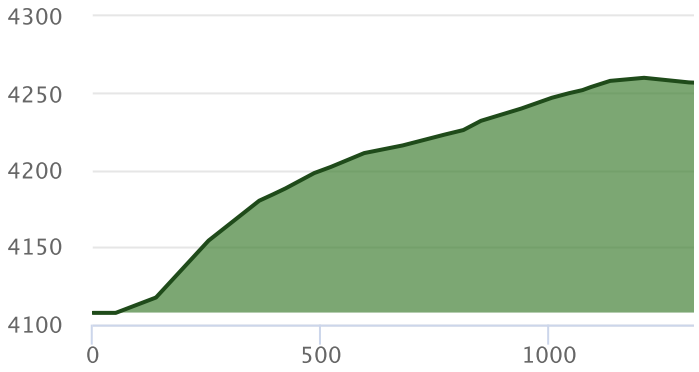
Attachment 3 ATTACHMENT F

Fire Line View / mountain bike trail

2,107 ft	153 ft	-67 ft	00:08:58
Distance	Climb	Descent	Avg time



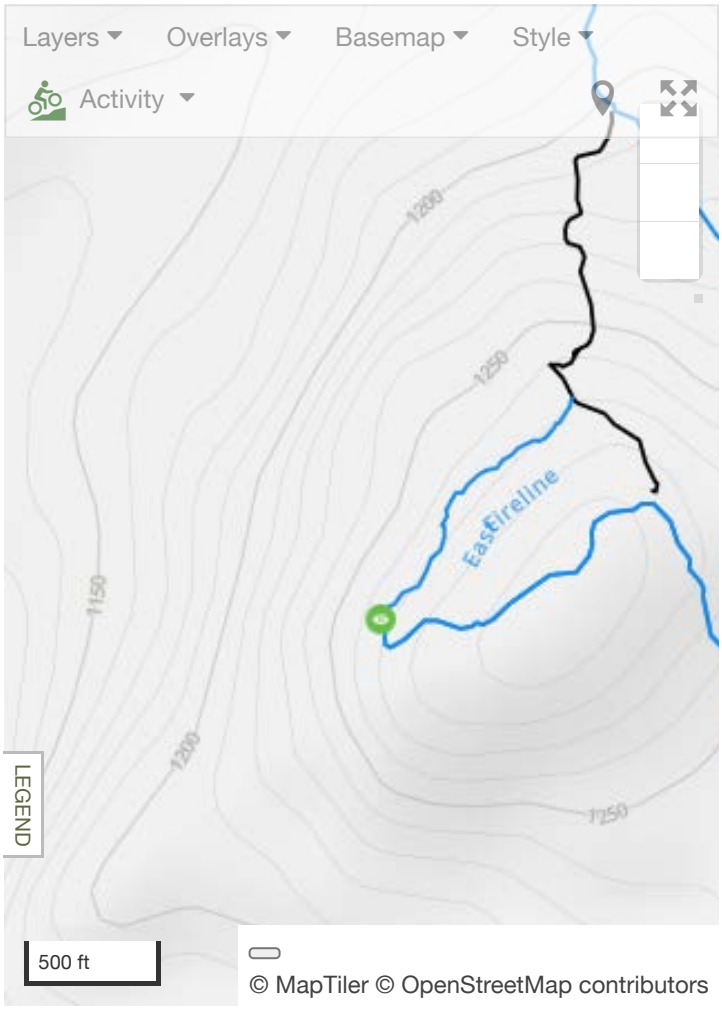
Status: ★★★½☆ Avg: 3.65 (3 votes)

on Sep 21, 2018

Dry

ridden | check-in | sav

view (48)



Directions to fire-line-view trailhead (47.992612, -114.008410)

Trail Supporters, Builders & Maintainers of Fire Line View Trail

USFS
Land Manager

Fire Line View Details

Activities:	Mountain Bike, Hike, Trail Running
Riding Area:	Crane Mountain Trails, Bigfork, Montana
Difficulty Rating:	Blue rate
Trail Type:	Singletrack
Bike Type:	AM
Trail Usage:	Multi-use

Just a short trail to one of the best views of the area.

This trail is

Attachment 3

ATTACHMENT F

Direction:	Downhill Primary
Climb Difficulty:	Blue
Physical Rating:	Moderate
Dogs Allowed:	Yes
TTFs on Trail:	Rock Face
Global Ranking:	#46706 in Mountain Biking
Local Popularity:	85 in Mountain Biking [+]
Year Opened:	2009

unsanctioned, use at your own risk!

More Stats for Fire Line View mountain bike trail trail

Altitude change:	86 ft	Altitude end:	4,193 ft	Distance down:	780 ft
Altitude min:	4,107 ft	Grade:	4.078%	Distance flat:	68 ft
Altitude max:	4,260 ft	Grade max:	-22.77	Avg time:	00:08:5
Altitude start:	4,107 ft	Grade min:	32.551	Avg reverse time:	00:04:3
		Distance climb:	1,259 ft		

view trail stats

Fire Line View Trail Reports

update trails status or condition

Sep 21, 2018 Worth the short effort for the view north.

view all reports »

Recent Ridelog Activity on Trail

Past Week	6 Months	All
0 rides	**13** rides **9 miles** avg distance	**43** rides

Technical Trail Features (TTF)

Viewpoint

Photos

no photos have been added for Fire Line View yet, add a photo.

Videos

no videos have been added for Fire Line View yet, add a video.

Reviews / Comments

No reviews yet, be the first to write a review or ask a question.
Use trail reports to comment on trail conditions.

Post a Comment

Nearby Trails

- Smokejumper 1,194 ft
- Dale Jorgenson Connector 1,286 ft
- Phillips Trail 1,332 ft
- East Fireline 2,260 ft
- Frack 4,587 ft

Crane Mount…

Crane Mountain Trails Trails
Crane Mountain Trails Trail Map
Crane Mountain Trails Trail Reports

Attachment 3 ATTACHMENT F

Submit

Local Weather

Bigfork

16th Wed

40°F - 41°F
humidity: 78
sunset: 4:43 pm

17th Thu

33°F - 37°F

18th Fri

33°F - 36°F

19th Sat

35°F - 39°F

Share Tweet Pin

embed Fire Line View trail on your website

Updated on Tue 2017-10-10 @ 12:11pm
Submitted on Mon 2015-03-30 @ 2:39pm
#27961 - 575 views

subscribe add to favorites flag

download

[edit] [activity log for fire line view mountain bike trail trail]

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Attachment 4

ATTACHMENT F

TRAILFORKS Mountain Bike Search for Trails, Regions, etc. search

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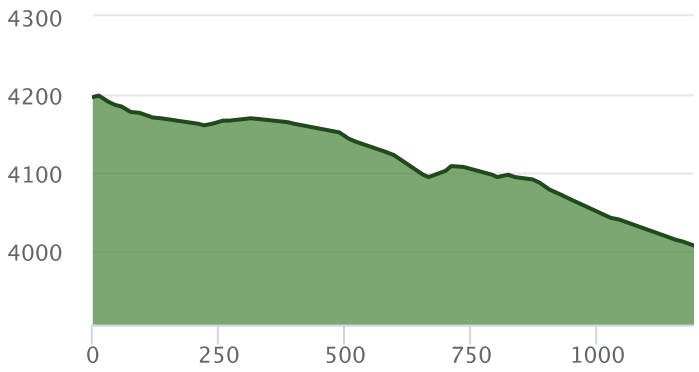
Smokejumper / mountain bike trail

Overview Photos (2) Videos (0) Reports (4) Comments (2) 3D Tour Leaderboard Ridelogs Stats Add / Edit

1,905 ft	26 ft	-316 ft	00:09:30
Distance	Climb	Descent	Avg time



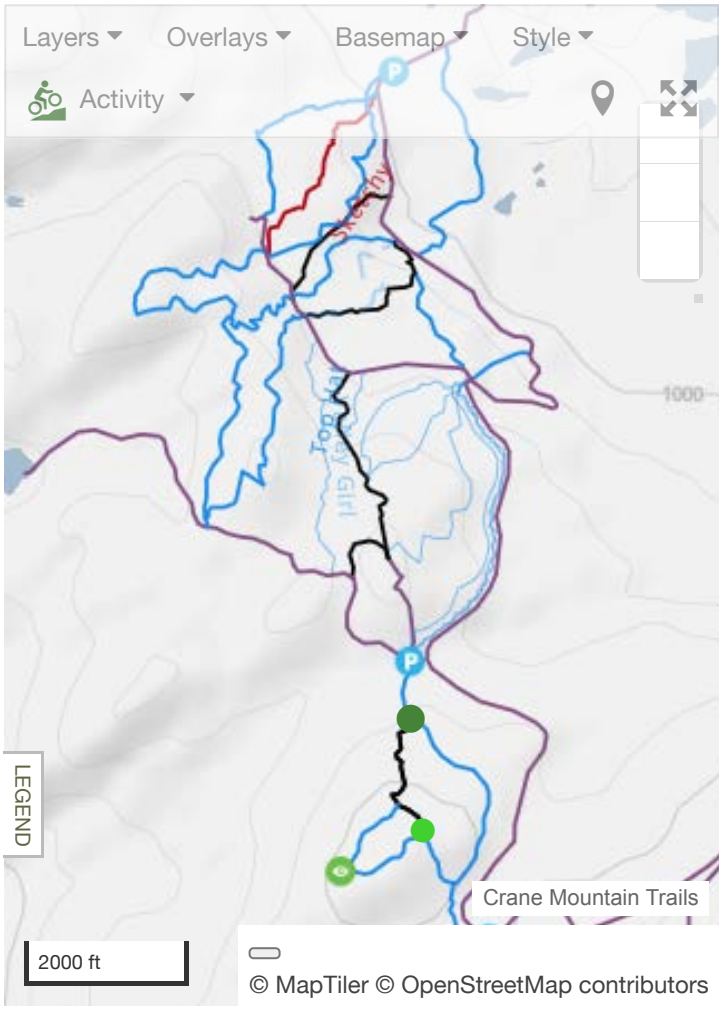
Status: ★★★★½ Avg: 4.35 (3 votes)

on Jun 18, 2020

Dry

ridden | check-in | sav

view (56)



Directions to smokejumper trailhead (47.994324, -114.010055)

Trail Supporters, Builders & Maintainers of Smokejumper Trail

USFS
Land Manager

Smokejumper Details

Activities:	Mountain Bike, Hike, Trail Running
Riding Area:	Crane Mountain Trails, Bigfork, Montana
Difficulty Rating:	Black Diamond rate
Trail Type:	Singletrack
Bike Type:	DH, AM, XC, DJ, Fat
Trail Usage:	Biking Primary

Trail is off of the Fire Line View trail. Entrance is slightly hidde

Attachment 4 ATTACHMENT F

Direction:	Downhill Primary Popular direction shown
Dogs Allowed:	Yes
TTFs on Trail:	Drop, Rock Face, Skinny
Global Ranking:	#26836 in Mountain Biking
Local Popularity:	90 in Mountain Biking [+]
Land Manager:	USFS

currently, but trail opens up. Nice drops, views, and steep descents characterize this trail. Built as a practice fire line originally by the Flathead Hotshot fire crew.

Access Info

Push up the Fire Line View off the Crane Mtn Road at the Phillips Trailhead and enjoy

Disclaimer

This trail is not sanctioned, ride at your own risk.

Local Trail Association

Flathead Trail Fairies

Montana Mountain Bike Alliance

Please consider joining or donating to the local trail association to support
trail development & maintenance.

donate to earn trail karma!

More Stats for Smokejumper mountain bike trail trail

Altitude change:	-290 ft	Altitude end:	3,907 ft	Distance climb:	171 ft
Altitude min:	3,907 ft	Grade:	-15.24	Distance down:	1,529 ft
Altitude max:	4,199 ft	Grade max:	-45.84	Distance flat:	205 ft
Altitude start:	4,197 ft	Grade min:	18.745	Avg time:	00:09:3

Smokejumper Trail Reports

update trails status or condition

Jun 18, 2020		Clear and good
May 31, 2019		Bueno
Sep 21, 2018		Super fun. Little vague up top.
May 13, 2017	REPORTER	Small tree down across trail, can ride over or around

view all reports »

Recent Ridelog Activity on Trail

Past Week	6 Months	All
0 rides	**16** rides **7 miles** avg distance	**52** rides

Attachment 4

ATTACHMENT F

Avg reverse 00:00:1 time: view trail stats

Photos

more »

66 | May 21, 2017

63 | May 20, 2017

2 Reviews & Comments

Score Time

MONTANABIKERMAN + 1

FTF (May 13, 2017 at 21:09)

Fun trail with lots of rock to play off. Has nice flow and keeps you on your toes!

[Reply]

MONTANABIKERMAN + 1

FTF (Jun 16, 2020 at 12:21)

All clear and in great shape.

[Reply]

Post a Comment

Submit

Videos

no videos have been added for Smokejumper yet, add a video.

Nearby Trails

Fire Line View 1,194 ft

East Fireline 1,785 ft

Dale Jorgenson Connector 2,480 ft

Phillips Trail 2,526 ft

Frack 3,507 ft

Crane Mount…

Crane Mountain Trails Trails

Crane Mountain Trails Trail Map

Crane Mountain Trails Trail Reports

Local Weather

Bigfork

16th Wed

40°F - 41°F

humidity: 78

sunset: 4:43 pm

17th Thu

33°F - 37°F

18th Fri

33°F - 36°F

19th Sat

35°F - 39°F

Share Tweet Pin

embed Smokejumper trail on your website

Updated on Sat 2017-05-20 @ 5:51pm

Submitted on Wed 2017-05-03 @ 5:15pm

By brushhog & contributors

#89343 - 612 views

subscribe add to favorites flag

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Attachment 4 ATTACHMENT F

[edit] [activity log for smokejumper mountain bike trail trail]

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Attachment 5

ATTACHMENT F

TRAILFORKS Mountain Bike Search for Trails, Regions, etc. search

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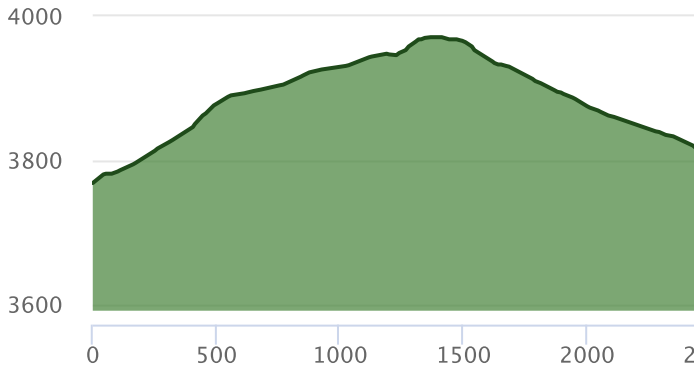
Top Hat / mountain bike trail

3,967 ft	209 ft	-387 ft	00:17:32
Distance	Climb	Descent	Avg time



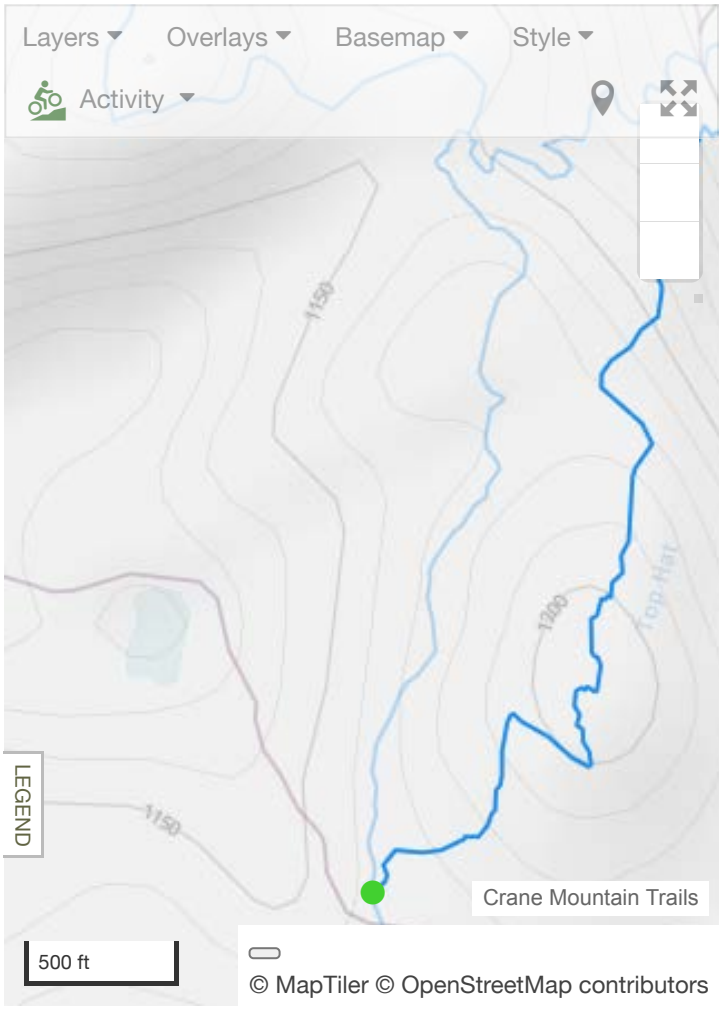
Status: ★★★☆☆ Avg: 3.15 (7 votes)

on Apr 13, 2017

Variable

ridden | check-in | sav

view (47)



Directions to top-hat trailhead (48.004840, -114.020930)

Trail Supporters, Builders & Maintainers of Top Hat Trail

USFS
Land Manager

Top Hat Details

Activities:	Mountain Bike, Hike, Trail Running
Riding Area:	Crane Mountain Trails, Bigfork, Montana
Difficulty Rating:	Blue rate
Hiking SAC Scale:	T1 Hiking
Trail Type:	Singletrack
Bike Type:	DH, AM, Fat

Trailhead is just past the bridge on the Estes Lake trail. Trail is

Attachment 5

ATTACHMENT F

Trail Usage:	Multi-use
Direction:	Downhill Primary Popular direction shown
Climb Difficulty:	Blue
Physical Rating:	Hard
Dogs Allowed:	Yes
TTFs on Trail:	Rock Face
Global Ranking:	#38968 in Mountain Biking
Local Popularity:	85 in Mountain Biking [+]

brushy for the first 50 yards, once in the trees the trail is easy to follow. The down-hill has several rock rolls as the trail twists and turns. The trail ends at the middle connector road.

This trail is unsanctioned, use at your own risk!

More Stats for Top Hat mountain bike trail trail

Altitude change:	-178 ft	Altitude end:	3,590 ft	Distance down:	2,347 ft
Altitude min:	3,590 ft	Grade max:	-40.72	Distance flat:	392 ft
Altitude max:	3,971 ft	Grade min:	40.517	Avg time:	00:17:3
Altitude start:	3,768 ft	Distance climb:	1,228 ft	view trail stats	

Top Hat Trail Reports

update trails status or condition

Apr 13, 2017	REPORTER	
Feb 28, 2017	REPORTER	All clear at start of Winter.
Nov 30, 2016	REPORTER	
Mar 2, 2015		
Nov 14, 2014		A challenging up-hill with a fun down. Lots of tight turns, drops and rock-rolls to deal with.

view all reports »

Recent Ridelog Activity on Trail

Past Week	6 Months	All
0 rides	**11** rides **9 miles** avg distance	**50** rides

Photos

no photos have been added for Top Hat yet, add a photo.

Videos

no videos have been added for Top Hat yet, add a video.

5 Reviews & Comments

Score Time

tickvball (May 29, 2017 at 8:39) + 0

Same as Enchanted Forest. Not really rideable right now.

Nearby Trails

- Enchanted Forest 171 ft
- Valley Girl 2,717 ft
- Original Sin 3,110 ft
- Snivel 3,169 ft
- Cirno 3,284 ft

Crane Mount…

Crane Mountain Trails Trails
Crane Mountain Trails Trail Map
Crane Mountain Trails Trail Reports

Attachment 5

ATTACHMENT F

[Reply]

coylesy (Sep 3, 2018 at 17:28) + 0

Too overgrown to ride

[Reply]

+ 1

MONTANABIKERMAN FTF (Oct 23, 2018 at 12:33)

0nly for the first 100 ft. once you enter the trees it's butter. There's no trees across the entire trail. You need to be a little more adventurous.

[Reply]

Schwamarama (Aug 29, 2020 at 12:28) + 0

Its rideable but pretty “back woodsy” - fun over all. Would only recommend riding down it.

[Reply]

Justinbloomington (Sep 20, 2020 at 19:52) + 0

Brushy and a little too overgrown for 1-200 feet. Push on through and you’ll be rewarded with a sick trail!

[Reply]

Post a Comment

Submit

Local Weather

Bigfork

16th Wed

41°F - 41°F
humidity: 77
sunset: 4:43 pm

17th Thu

33°F - 37°F

18th Fri

33°F - 37°F

19th Sat

35°F - 39°F

Share Tweet Pin

embed Top Hat trail on your website

Updated on Thu 2019-01-24 @ 12:10am
Submitted on Mon 2014-11-03 @ 3:41pm
#20214 - 1,018 views

subscribe add to favorites flag

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[edit] [activity log for top hat mountain bike trail trail]

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Attachment 5

ATTACHMENT F

Support Forum

Help

Attachment 6

ATTACHMENT F

Original Sin / mountain bike trail

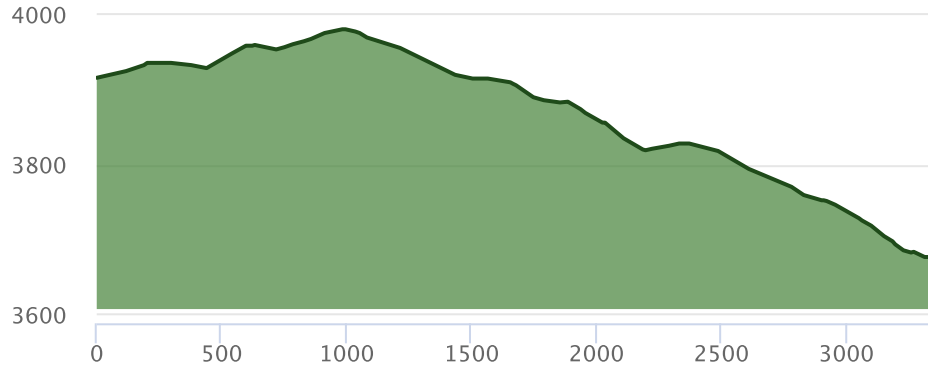
3,846 ft	90 ft	-400 ft	00:14:22
Distance	Climb	Descent	Avg time

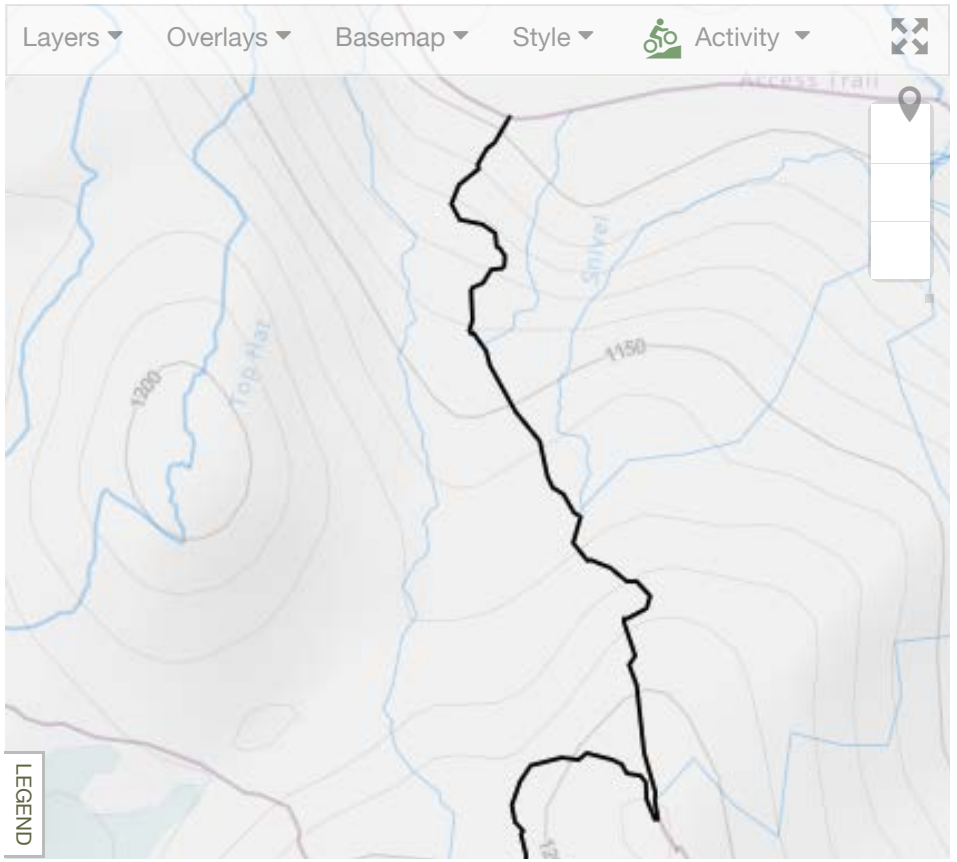
Status: on Jun 18, 2020
Dry

Avg: 4.85 (6 votes)

ridden | check-in | save

view (52)





Trail Supporters, Builders & Maintainers of Original Sin Trail

USFS
Land Manager

Original Sin Details

Activities: Mountain Bike

This route is the easy way to access the top of the trail. There is a more

Attachment 6

ATTACHMENT F

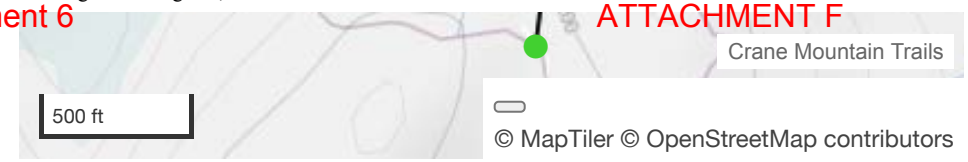
Riding Area:	Crane Mountain Trails Bigfork, Montana
Difficulty Rating:	Black Diamond rate
Trail Type:	Singletrack
Bike Type:	DH, AM, Fat
Trail Usage:	Biking Only
Direction:	Downhill Primary Popular direction shown
Dogs Allowed:	Yes
TTFs on Trail:	Rock Face
Ride in Rain:	Yes
Global Ranking:	#13352 in Mountain Biking
Local Popularity:	90 in Mountain Biking
Year Opened:	2009

popular route to the top. This trail has several drops and long rock-rolls to make it one of the most popular trails in the area.

Access Info

Access through the Estes Lake trail #96

This trail is unsanctioned, use at your own risk!



Directions to original-sin-21101 trailhead (48.002870, -114.013580)

Original Sin Trail Reports

update trails status or condition

✓	Jun 18, 2020	No trees down, no issues
✓	May 31, 2019	
!	Jul 10, 2018	
!	Sep 3, 2017	REPORTER There are two trees across the trail near the bottom. A chainsaw will be required.
!	Jun 12, 2017	REPORTER One tree down just below the big rock roll.

view all reports »

More Stats for Original Sin mountain bike trail trail

Altitude change:	-309 ft	Altitude end:	3,606 ft	Distance down:	2,646 ft
Altitude min:	3,606 ft	Grade:	-8.045%	Distance flat:	314 ft
Altitude max:	3,981 ft	Grade max:	-28.555%	Avg time:	00:14:22
Altitude start:	3,916 ft	Grade min:	19.809%	view trail stats	
		Distance climb:	886 ft		

Recent Ridelog Activity on Trail

Past Week	6 Months	All
0 rides	**10** rides **8 miles** avg distance	**48** rides

Photos

more »

Videos

more »

Attachment 6

ATTACHMENT F

go pro clip

0:21 | | Feb 21, 2015 , Bigfork

9:40 | 253 | Oct 12, 2010 , Bigfork

10 | Aug 28, 2020

10 | Aug 28, 2020

8:43 | 225 | Aug 26, 2010 , Bigfork

3:51 | 170 | May 24, 2010 , Bigfork

37 | Jun 18, 2020

240 | Mar 31, 2016

3 Reviews & Comments

Score Time

kntr (Nov 15, 2014 at 21:37) + 1

★★★★☆

Awesome trail. This is one of my favorites in the Crane Mountain Trails.

[Reply]

tickvball (May 29, 2017 at 8:41) + 0

Definitely a good one! Little Rock drops and techy features scattered throughout.

[Reply]

Nearby Trails

- Valley Girl 407 ft
- Swoosh 837 ft
- Estes Lake 1,798 ft
- Frick 1,831 ft
- Jump Line 1,877 ft

Crane Mountain T…

Crane Mountain Trails Trails
Crane Mountain Trails Trail Map
Crane Mountain Trails Trail Reports

Local Weather

Bigfork
29th Tue

30th Wed	31st Thu	1st Fri
24°F - 31°F	30°F - 34°F	28°F - 35°F

Attachment 6

ATTACHMENT F

MONTANABIKERMAN FTF (Jun 16, 2020 at 12:18) + 1

All clear and in great condition.

[Reply]

Post a Comment

Submit

26°F - 29°F
humidity: 89
sunset: 4:50 pm

Share Tweet Pin

embed Original Sin trail on your website

Updated on Thu 2017-10-12 @ 2:32pm
Submitted on Wed 2014-11-12 @ 5:50pm
#21101 - 1,827 views

subscribe add to favorites flag download

[edit] [activity log for original sin mountain bike trail trail]

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ATTACHMENT G

From: **Keith Hammer** keith@swanview.org
Subject: Bug Creek - Exceed Max Opening
Date: February 2, 2021 at 10:43 AM
To: Dowling, Chris -FS chris.dowling@usda.gov, Leanne Marten leanne.marten@usda.gov
Cc: Michele Mavor michele.mavor@usda.gov

KH

Dear Ranger Dowling and Regional Forester Marten;

Ranger Dowling's 12/11/20 invitation to comment on excessive clearcut sizes proposed in the Bug Creek Project fails to list all the clearcuts and other "regeneration" openings that would exceed the Forest Plan maximum of 40 acres.

His notice does list the logging units that will create 4 openings in excess of the Forest Plan's limited exceptions to the 40-acre maximum, two of which exceed one-half-square-mile (326, 126, 321, and 106 acres)!

We oppose these excessively large logging units, which violate even the "exceptions" to the mandatory "maximum" of 40 acres. That is what the Forest Plan maximum standard is for.

These large openings will greatly increase the spread of wildfire, as confirmed by the attached Atchley et al 2021 research paper. This paper finds openings on the order of only 15 meters/yards reduce fire behavior, while openings greater than 30 meters/yards increase "all fire behavior metrics."

The Atchley paper, on page 9, finds:

"Wind entrainment associated with large, sparse canopy patches resulted in both mean and localised wind speeds and faster fire spread. Furthermore, the turbulent wind conditions in large openings resulted in a disproportional increase in TKE [Turbulence Kinetic Energy] and crosswinds that maintain fire line width."

The Atchley paper, on page 7, also notes that heavier forest fuels actually slow fire spread.

While this is a new study, similar findings have been reported for years.

Good layperson's graphics can be found on the interagency "Living with Fire" publications, such as can be found at:
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_020876.pdf
Though the various regions put their own stamp under the header on page 2, page 4 provides the graphics showing that an open pine forest can burn at 150 acres per hour while dense conifer forest can burn at 15 acres per hour with 20mph wind speeds.

Another version of "Living with Fire" includes an additional graphic showing "dense conifer reproduction" can burn at 650 acres per hour with 20 mph winds: https://firesafemt.org/img/LivingwFireFSM20091.pdf

These are the booklets passed out to the public, so you'd think people would rightly question why the Forest Service wants to replace dense conifer forests with clearcuts and grass followed by densely packed little trees - in large openings conducive to higher wind speeds.

You are dead wrong to propose large clearcut openings in the name of reducing severe fire behavior. If reducing the severity and spread of fire were your true intention, you would be creating openings on the order of 15 meters, not half of a square mile!

Keith

Atchley_IJWF_2021.pdf

Keith
Keith Hammer - Chair
Swan View Coalition
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Kalispell, MT 59901
406-755-1379 (office)
406-253-6536 (cell phone)
keith@swanview.org
http://www.swanview.org
http://www.swanrange.org
http://www.facebook.com/SwanViewCoalition
http://www.youtube.com/user/swanviewcoalition

"Nature and human nature on the same path."

ATTACHMENT H

CSIRO PUBLISHING

International Journal of Wildland Fire
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Effects of fuel spatial distribution on wildland fire behaviour

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Abstract. The distribution of fuels is recognised as a key driver of wildland fire behaviour. However, our understanding of how fuel density heterogeneity affects fire behaviour is limited because of the challenges associated with experiments that isolate fuel heterogeneity from other factors. Advances in fire behaviour modelling and computational resources provide a means to explore fire behaviour responses to fuel heterogeneity. Using an ensemble approach to simulate fire behaviour in a coupled fire–atmosphere model, we systematically tested how fuel density fidelity and heterogeneity shape effective wind characteristics that ultimately affect fire behaviour. Results showed that with increased fuel density fidelity and heterogeneity, fire spread and area burned decreased owing to a combination of fuel discontinuities and increased fine-scale turbulent wind structures that blocked forward fire spread. However, at large characteristic length scales of spatial fuel density, the fire spread and area burned increased because local fuel discontinuity decreased, and wind entrainment into the forest canopy maintained near-surface wind speeds that drove forward fire spread. These results demonstrate the importance of incorporating high-resolution fuel fidelity and heterogeneity information to capture effective wind conditions that improve fire behaviour forecasts.

Keywords: fire behaviour modelling, fuel classification, fuel representation, wind response.

Received 20 June 2020, accepted 14 December 2020, published online 27 January 2021

Introduction

It is exceedingly difficult to know *a priori* if a wildland fire will extinguish, or spread and contribute to the annual 36 to 46 million km^2 burned globally (Doerr and Santín 2016). Nevertheless, this knowledge is critical for forecasting if a wildland fire will meet management targets or for guiding management response to fires that endanger lives and property. A combination of environmental factors – including wind, topography, fuel moisture, and the amount and arrangement of fuel – determine wildland fire behaviour. For example, the spatial distribution of fuel heterogeneity, which determines the arrangement of combustible material and local wind flows, significantly influences fire behaviour (Turner and Romme 1994; Finney 2001; Knapp and Keeley 2006; Parsons *et al.* 2017). Simulated wind conditions, coupled to fire interacting with heterogeneous forest canopies, show that fire behaviour is affected by fuel structure (Pimont *et al.* 2011; Linn *et al.* 2013; Hoffman *et al.* 2015; Parsons *et al.* 2017; Ziegler *et al.* 2017). However, studies that systematically characterise the sensitivity of fire behaviour to fuel heterogeneity are absent owing to poorly described fuel conditions and computational or experimental costs. Therefore, the response of fire behaviour to fuel arrangement remains poorly quantified, which limits estimates of fire outcomes.

Over the past two decades, a growing breadth of fire scenarios – ranging from prescribed fires in marginal conditions to high-intensity wildfires – and the increasing availability of computational resources have motivated the development of coupled fire–atmosphere models, such as WFDS (Mell *et al.* 2007, 2009; Bova *et al.* 2016), FIRESTAR3D (Frangieh *et al.* 2018; Morvan *et al.* 2018), FIRETEC (Linn 1997; Linn *et al.* 2002) and QUIC-Fire (Linn *et al.* 2020). These models resolve wind fields that are consistent with local heterogeneous vegetation structure and respond to dynamic two-way feedbacks between the fire and surrounding winds that compare well with observations (Linn and Cunningham 2005; Linn *et al.* 2012; Hoffman *et al.* 2016). By simulating wind flows and explicitly accounting for shear stress through canopy structures, including intermittent gusts and lulls that result from gaps between groups of trees (Pimont *et al.* 2009), fire

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ATTACHMENT H

behaviour simulations respond to the aerodynamic influences of canopy structure and the spatial heterogeneity of vegetation and buoyant heat from combustion. Although many of these models are too computationally expensive for operational use, they allow a fully three-dimensional description of the forest. The development of this class of models now lets us test how sensitive simulated fire behaviour is to representation of fuel and the characterisations of fuel heterogeneity, especially for low-intensity fires that are more sensitive to fuel arrangement compared with high-intensity fires (Clements *et al.* 2016).

Discontinuities in the horizontal distribution of canopy fuels associated with large-scale heterogeneities create wind patterns (Dupont and Brunet 2007) that influence fire behaviour. Forest structure affects the fire environment by determining: (1) the distribution of combustible material; (2) the ambient flow patterns through and around vegetation (Gao and Shaw 1989; Finnigan 2000; Pimont *et al.* 2011); and (3) the response of winds to the heat released during the fire (Kiefer *et al.* 2018). Canopy heterogeneity increases the spatial and temporal variation in the wind field within and just above the canopy, with the intermittent sweeping of fast-moving air down into the canopy and the ejection of slow-moving air upward out of the canopy (Kiefer *et al.* 2016; Kiefer *et al.* 2018; Moon *et al.* 2019). The aggregated effects of this turbulence alter the mean wind shear above (Dupont and Brunet 2008), within and below the canopy. Likewise, the distribution of fuels influences the spatial patterns of winds that can be drawn in by the fire and fire-influenced winds that feed back to fire behaviour (Kiefer *et al.* 2018).

Variability in wind conditions associated with boundary-layer turbulence and wind–canopy interaction is recognised as a chief contributor to uncertainty in fire behaviour (Burrows *et al.* 2000; Sun *et al.* 2009; Linn *et al.* 2012; Pinto *et al.* 2016; Benali *et al.* 2017). Atmospheric turbulence is amplified when winds interact with fire (Clements *et al.* 2008), increasing uncertainties in fire behaviour simulations, especially under marginal fire conditions (Hiers *et al.* 2020) when fire-influenced winds are significantly stronger than ambient winds. This complicates the ability to measure how forest heterogeneity interacts with fire-influenced winds to affect fire behaviour.

Given the influence of canopy structure on ambient and fire-induced winds, it is essential to explicitly account for the effects of canopy structure when exploring the interaction between forest structure and fire behaviour (Hilton *et al.* 2015). Nevertheless, the effects of forest heterogeneity on the variability of fire behaviour have not been quantified adequately (Parsons *et al.* 2017) because few studies systematically account for increasing levels of fuel variability. Therefore, a generalised understanding of how spatial fuel characterisation determines fire behaviour is lacking. By identifying how fuel heterogeneity influences fire behaviour and describing essential aspects of fuel heterogeneity, simulated uncertainty and fire behaviour variability can be constrained.

To determine the influence of vegetation structure on fire behaviour, an analysis of ensembles of simulations is required to avoid confounding mean behaviour with the influences of site and moment-specific conditions (Parsons *et al.* 2017). Fire behaviour at a specific location in time and space is a function of the site and moment-specific environmental conditions, including the local arrangement of fuels and timing of gusts relative to the fire's arrival at that location. The absence of precise knowledge of fuel locations or relative timing of fires and wind events limits predictability (Pimont *et al.* 2017). Ensembles of vegetation scenarios with the same macro-scale characteristics (e.g. canopy bulk density) but different fine-scale characteristics (e.g. the position of individual trees) can help (1) determine the sensitivity of fire behaviour to fine-scale fuel characteristics, and (2) quantify the uncertainty associated with fire behaviour forecasts. By performing ensemble simulations with a physics-based model of combined dynamic winds and fire behaviour, we can quantify both the mean and variability in fire behaviour associated with macro-scale fuel heterogeneity. Likewise, an ensemble approach provides a measure of fire behaviour uncertainty within constrained conditions (Pinto *et al.* 2016) that can inform fuel management planning and risk assessment frameworks for operational use (Ager *et al.* 2011; Finney *et al.* 2011). Increasingly, probabilistic ensemble methods have also been shown to elicit fundamental behaviour within complex fire models that account for non-linear processes (Cruz and Alexander 2017). To discern fire behaviour sensitivity to details of fuel heterogeneity, ensembles of multiple fuel beds that have the same domain fuel load and spatial characterisation of the variance of fuel density are required. Here, we investigated the sensitivity of fire behaviour simulations in FIRETEC to spatial characterisation of fuel arrangement. Virtual canopies with the same macro-scale characteristics but different degrees of detail in representation were developed to perform ensemble fire behaviour simulations.

Methodology

We used FIRETEC, a mechanistic fire–atmosphere model, to investigate how the representation and heterogeneity of fuel influence simulated fire behaviour. We generated ensembles of virtual forest canopies based on field measurements from a 50 × 20-m ponderosa pine (*Pinus ponderosa*)-dominated plot near Flagstaff, AZ, with 860 trees ha^{-1}, a mean diameter at breast height (DBH) of 23 cm and a mean tree height of 14 m (Linn *et al.* 2005). Each ensemble features identical macro-scale characteristics, including domain average and vertical profiles of fuel density (0.083 kg m^{-3}) (Fig. 1, plot (*a*)), average tree height, and average height to live crown, but with different variance and spatial characterisation of fuel conditions. We conducted a total of 101 simulations, including 20 replicates each of five different heterogeneous fuel distributions, and an unreplicated simulation with a homogeneous fuel distribution (Average Fuel). We explored the spectrum of fuel fidelity starting with the low-fidelity homogeneous or Average Fuel case. The five heterogeneous fuel scenarios represent a stepwise increase in fuel fidelity and length scales of fuel heterogeneity representation. They are: (1) Average Tree, with one representative tree randomly replicated across the domain (no difference between trees); (2) Forest Data, with variable trees, whose attributes match field data, randomly placed across the domain; (3) 15-m Gaps, with the same fuel fidelity as Forest Data, but with trees aggregated to create 15-m gaps; (4) 30-m Gaps, same as Forest Data, with trees aggregated to create 30-m gaps, and (5) 45-m Gaps, same as Forest Data, with trees aggregated to create 45-m gaps. In each simulation, the total fuel load was held constant, and only the

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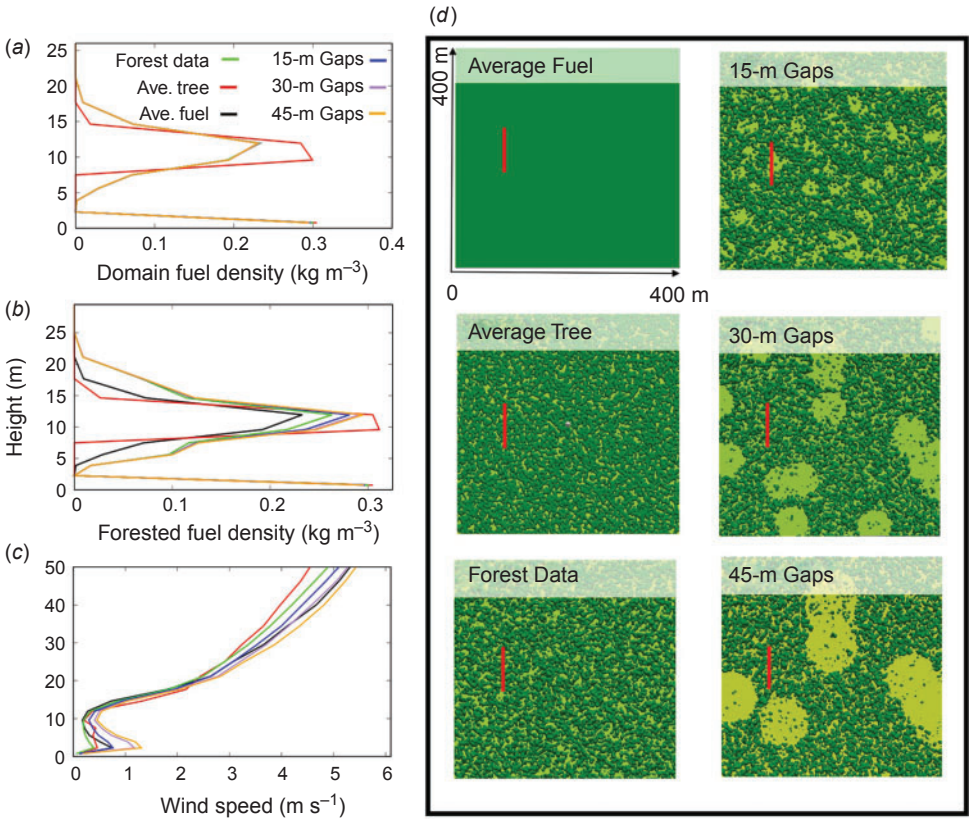

Fig. 1. (*a*) Domain-average vertical fuel density profiles for each ensemble; note that all ensembles except Ave. Tree overlap. (*b*) Vertical fuel density profiles averaged over areas with canopy fuel densities above zero. Note that excluding areas where vertical fuel density equalled zero resulted in a gradation of fuel density with increased fuel variance. Domain fuel density equalled 0.083 kg m^{-3} for all ensembles, and variation of canopy fuel density plotted was due to differences in tree density for the areas with trees. (*c*) Ensemble-average *u* wind (streamwise velocity) profiles to 50 m above the surface before ignition. (*d*) Example fuel domains for each of the six ensembles. Red lines denote the fire ignition locations.

Table 1. Domain fuel load characteristics

Representation class (Ensemble)	Fuel density variance	Fuel density correlation length (m)
Average Fuel	0	0
Average Tree (1)	0.188	1
Forest Data (2)	0.299	2
15-m Gaps (3)	0.359	10
30-m Gaps (4)	0.364	27
45-m Gaps (5)	0.377	40

arrangement of the trees was altered. The 20 replicates were developed by rerandomising tree and gap locations. All simulations were performed in 400 × 400-m domains with 2-m horizontal discretisation to a height of 600 m. Domain fuel density was defined as the total mass of fuel within the 160 000-m^2 domain between the ground and 22.9 m, top of the highest cell containing fuel. We established a gradient of fuel density variability between the ensembles, starting with 0 (kg m^{-3})^2 for the Average Fuel ensemble and increasing to 0.377 (kg m^{-3})^2 for the 45-m Gap ensemble (Table 1). Likewise, there was a gradient of increasing lengths at which deviations from the local fuel load were no longer similar (correlation lengths).

We developed a different 3D fuel density arrangement for each replicate within each ensemble using values for tree height, crown radius and height to live crown obtained from data. For the Forest Data ensemble, the distribution of fine fuel in the canopy was parameterised following the methods outlined by Linn *et al.* (2005), where sampled trees and their dimensions were randomly placed throughout the domain to maintain observed stem density and forest characteristics. We developed the Average Tree virtual forest realisations by first estimating the mean tree height, height to live crown and crown circumference, and then randomly populating the domain with trees that had these properties. Note that populating the domain with a single-tree representation resulted in slightly different vertical profiles of fuel density (Fig. 1*a*). To develop the Average Fuel realisation, we computed the vertical distribution of fuel by horizontally averaging every vertical layer in the Forest Data domains. This vertical distribution was then applied to every *x* and *y* location to establish a horizontally homogeneous forest with the same vertical distribution of fuel density as for the

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Forest Data cases. Because there was no spatial variation in the Average Fuel realisation, only one ensemble member was used. For the 15-, 30- and 45-m Gap ensembles, we randomly selected locations for gap creation. All trees within the gap were then moved to a new random location, which might be placed back in the gaps, thus ensuring that the overall fuel load and canopy density was maintained among ensembles. This approach effectively decreased the fuel density within the designated patches and increased the fuel density in other areas (Fig. 1*b*), which mimics the structure found in forests with natural disturbances (Lindenmayer and Franklin 2002; Mitchell *et al.* 2006).

We parameterised surface fuels assuming that grass dominates in the spaces between trees, and litter accumulates and diminishes grass loads beneath trees. We used a grass fuel density of 0.35 kg m^{-3}, which had a height of 0.7 m, and a litter fuel density of 0.5 kg m^{-3}, which had a maximum litter depth of 10 cm under dense trees. The spatial distribution of grass and litter contributed to the overall domain fuel density variance and spatial gradients of fuel density variance. As described in Linn *et al.* (2005), the total fuel loads in surface cells included contributions from grass, litter, and short trees that reached into the lowest computational cell. The aggregated fuel properties of the combined surface fuels (e.g. moisture and height) were determined via a mass-weighted average. We observed no difference in domain surface fuel density between ensembles (Fig. 1*a*; all lines overlap below 2 m).

Fire simulations

To represent wind conditions characteristic of a given ensemble, turbulent structures need to develop in response to the simulated forest structure from an initial inflow boundary condition, which generally requires simulations to include a long fetch area. To reduce the size of the computational domain, we used the methodology described in Pimont *et al.* (2020). A large-scale pressure gradient force and cyclic boundary conditions, where winds exiting the domain are cycled back as inflow into the domain, create the long fetch necessary for turbulence to adjust to the ensemble fuel structure. This results in turbulent structures evolving within the model domain to be spun up and used as inflow boundary conditions during the fire simulation. We developed ensemble-specific wind fields using a single representative fuel arrangement for each ensemble. A 3-m s^{-1} streamwise wind speed (u) was specified at 25 m above the ground, ~10 m above the canopy that accompanied an initial log profile wind speed with height. This fairly low wind speed was chosen to represent marginal fire spread conditions. The winds and turbulence were spun up in this manner for 500 s, at which time the mean vertical velocity profile and the turbulence profiles ceased to change with time. Using the cyclic boundary condition mode, we simulated turbulent winds for each ensemble type for an additional 20 min as forcing conditions for the combustion simulations.

Each realisation within a given ensemble used the same representative forcing conditions but resulted in different wind profiles, as determined by the specific drag imparted by the characteristic spatial fuel arrangement of that ensemble (Fig. 1). These forcing conditions were applied for an additional 400 s before the time of ignition so that the flow field could adjust to the specific vegetation distribution. Ignition in each simulation was achieved by bringing surface and canopy fuels up to combustion temperatures (1000 K) for 3 s in a 100-m-long and 4-m-deep rectangular area located 100 m from the upwind domain boundary. The idealised ignition method is intended to ensure each realisation starts with a similar region of combustion. Not including the model spin up, each realisation required 64 processors and 16 h of wall-clock time to simulate combustion, resulting in 103 524 CPU hours for all combustion simulations. Spinning up wind fields for all ensembles required an additional 12 288 CPU hours.

Fire and wind behaviour metrics

For each ensemble and realisation, we calculated the forward rate of fire spread, heat release per unit area and the total area burned. We calculated the spread distance for each fire to be the farthest distance of the fire front from the ignition line along the streamwise wind direction (u) and plotted it against time to evaluate the forward rate of fire spread. Heat release per unit area is the total amount of energy released by combustion per second divided by the area of the fire, and therefore has units of kilowatts per metre squared. The area burned was estimated as the total area of the domain where combustion (i.e. loss of fuel mass) occurred projected onto a 2D plane. We quantified domain wind conditions in terms of turbulence kinetic energy (TKE), which is a measure of the energy associated with fluctuations in the wind field shear stress. TKE was calculated by summing the variances of the directional wind component:

$$\mathrm{TKE} = \frac{1}{2}((u'u') + (v'v') + (w'w')) \tag{1}$$

where:

$$\begin{aligned} u'u' &= \frac{1}{t}\int_0^t \left(u_{(t,i,j)} - \overline{u}_{(i,j)}\right)^2 dt \\ v'v' &= \frac{1}{t}\int_0^t \left(v_{(t,i,j)} - \overline{v}_{(i,j)}\right)^2 dt \\ w'w' &= \frac{1}{t}\int_0^t \left(w_{(t,i,j)} - \overline{w}_{(i,j)}\right)^2 dt \end{aligned} \tag{2}$$

Here, u is the streamwise horizontal wind component, v is the cross-stream horizontal wind component, w is the vertical wind component, i and j are the indices of specific cells, and t is the time index.

Results and discussion

The Average Fuel simulation had the greatest forward spread, heat release rate per unit area and area burned (Fig. 2). The Average Tree ensemble with randomly placed trees slowed the forward spread and decreased fire intensity compared with the Average Fuel simulation. Increasing the level of detail in the representation of fuels resulted in added variations in fuel density, such as small gaps between trees that caused the fire to slow and reduced heat per unit area. Likewise,

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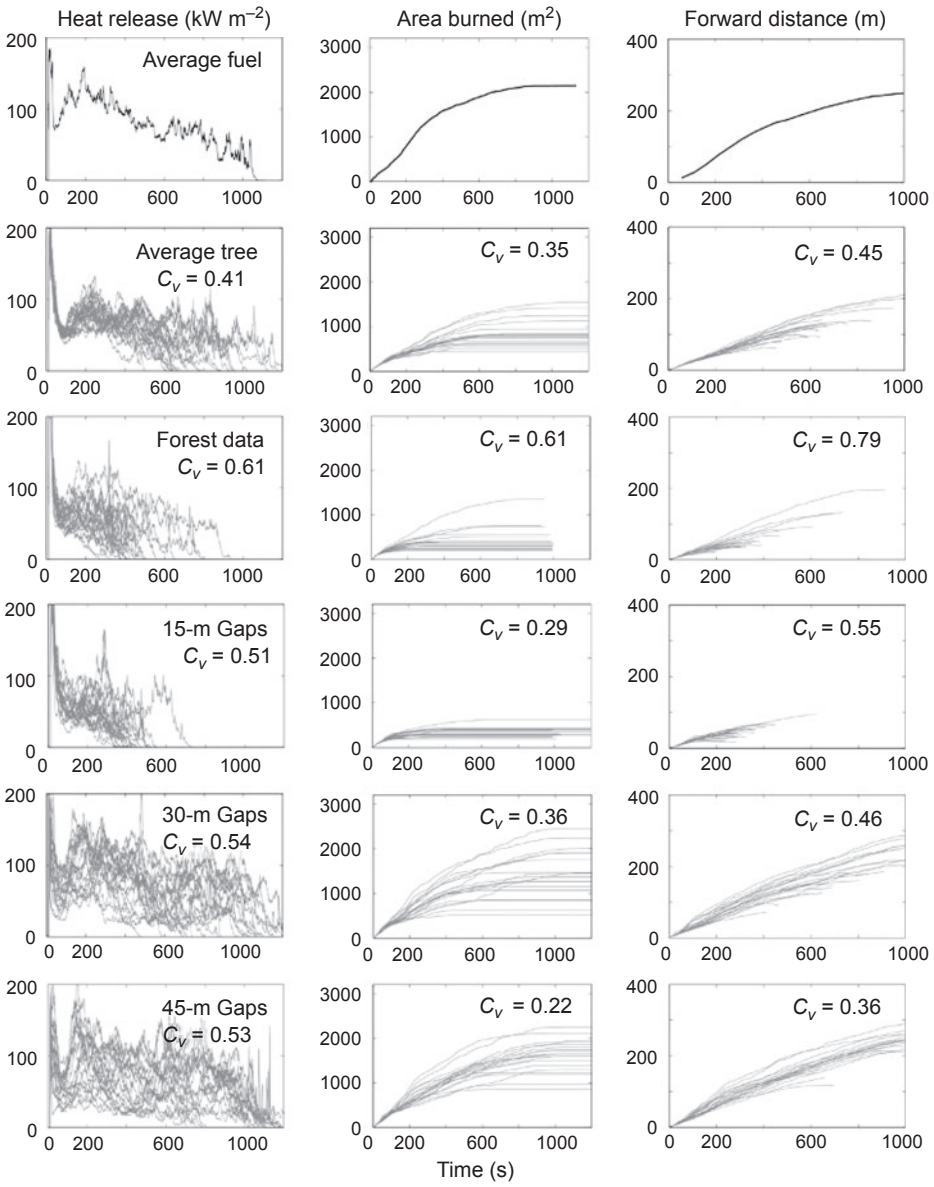

Fig. 2. Time series of fire intensity (left), area burned (centre), and forward progress of fire (right) highlight variability in fire metrics for all ensembles except for Average Fuel, which only has one ensemble member. The coefficient of variation, $C_v = \frac{\sigma}{\overline{X}}$ (σ is the standard deviation and $\overline{X}$ is the mean), is also provided for each ensemble.

increasing the variation of sizes and shapes of trees to that of the Forest Data and 15-m Gap ensembles further reduced heat released, rate of spread and area burned. Conversely, increasing local canopy density and the length scale of sparse forest gaps from the 15-m to the 30- and 45-m ensembles resulted in simulated fire behaviour metrics to rebound compared with the simulated results of the Average Tree, Forest Data and 15-m Gap ensembles. The increase in fire behaviour metrics for the 30- and 45-m Gap ensembles demonstrates that increasing variability in spatial fuel density does not necessarily act to slow fire progression and that fire behaviour is a result of complex interactions with fuel structure.

Ensemble results (Fig. 2) show a range of fire outcomes within each characteristic fuel representation, except for the Average Fuel simulation, which did not have any replicates. The range in fire behaviour outcomes for each ensemble was determined by the variation between details of specific fuel representations, fuel arrangement for given realisations and the associated wind variability. Interestingly, the range in fire behaviour metrics did not increase along the gradient of fuel density variability because the Forest Data and the 15-m Gap ensembles generally did not propagate fire and extinguished quickly. However, when scaled by the mean fire behaviour, the coefficient of variability for the Forest Data remained high.

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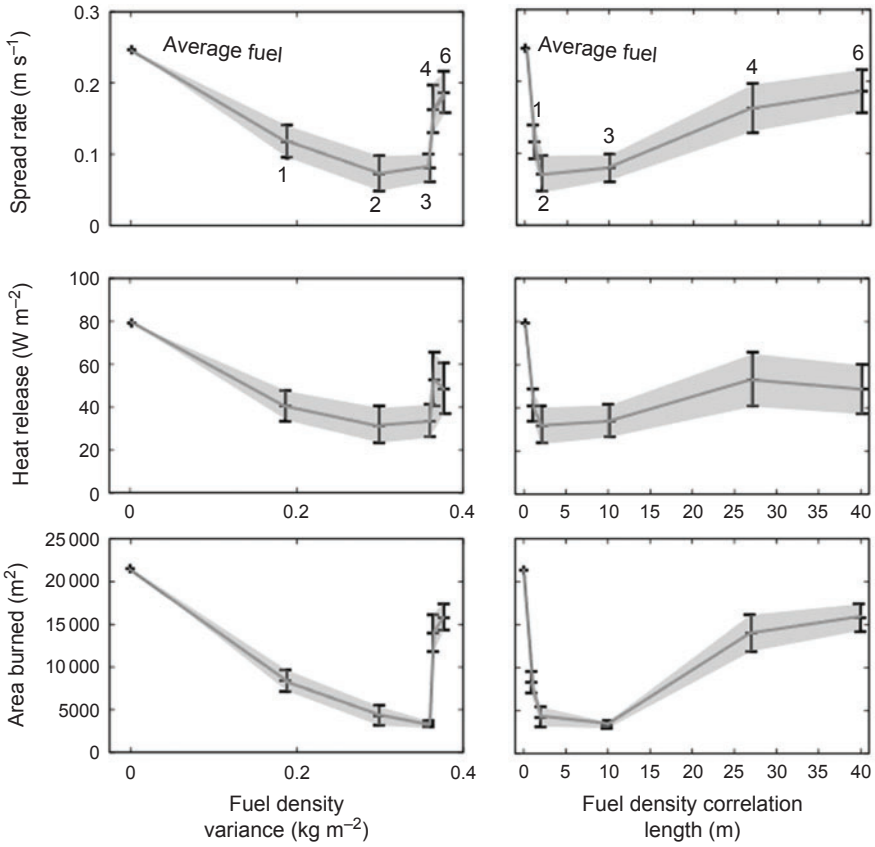

Fig. 3. Mean and the 95th confidence interval of spread rate, heat release rate, and area burned for each ensemble plotted against variation in fuel density and correlation length of fuel density. Numbered ensembles are cross-referenced in Table 1.

Furthermore, one Forest Data realisation carried 200 m, which contributed to the observed variability in that ensemble (Fig. 2). This suggested that while there is a high probability that fires in the Forest Data ensemble will not spread under the conditions simulated, there is also the possibility that some fires will act outside the ensemble characteristic. Similarly, the large fuel density correlation lengths in the large-gap ensembles also contributed to variability in fire size and behaviour, similar to what Parsons *et al.* (2017) observed.

Emergent fire behaviour from characteristic fuel variability

Differences between ensembles indicated that both the representation and heterogeneity of fuel density influenced fire behaviour. How fuel arrangement characteristics influenced probable fire behaviour in these marginal conditions was shown by plotting summarised fire behaviour metrics for each ensemble against the domain variance of fuel density and the correlation length of that variability (Fig. 3). As fuel density variability increased, all fire behaviour metrics (forward spread, heat released and area burned) decreased linearly for correlation lengths less than 10 m. However, as the correlation length of fuel density increased beyond 10 m, the fire behaviour metrics rebounded (Fig. 3). In the 30- and 45-m Gap ensembles, which correspond to correlation lengths of 27 and 40 m respectively, all fire behaviour metrics increased compared with the other ensembles except for the Average Fuel case. The 45-m Gap ensemble had slightly greater spread rates and area burned than the 30-m Gap ensemble, whereas the 30-m Gap ensemble had a slightly greater heat release. However, these changes were also associated with an increased variance for both the 30- and 45-m Gap ensembles, and distinguishing ensemble trends from each other was difficult.

These results have three implications for simulating fires in a forest with heterogeneous fuels using process-based modelling: (1) there can be significant differences associated with representing the canopy and surface fuels as a homogeneous layer for ecosystems that naturally include gaps between trees; (2) the variability between sizes and shapes of trees in the forest can have significant impacts on fire behaviour by slowing spread; and (3) the length scales of heterogeneity in fuel density also influenced fire behaviour, where length scales greater than 10 m increased rate of spread and area burned. The sensitivity of fire behaviour to fuel fidelity and variability highlighted in these results suggests the need for increased fuel description detail. Historically, fuels were characterised using stand-scale spatially averaged descriptors (i.e. canopy bulk density, canopy base height), often without considering the within-stand variability (Hoffman *et al.* 2016). However, rapidly evolving remote sensing and machine learning techniques can now characterise three-dimensional fuel structure, including tree-scale spatial

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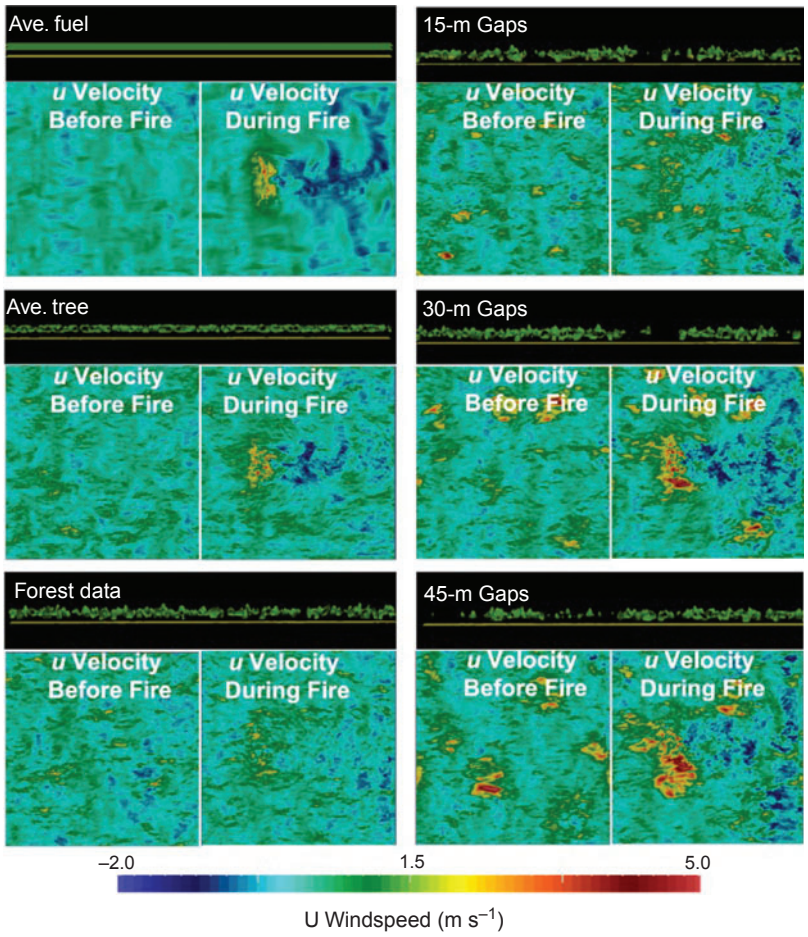

Fig. 4. Horizontal fuel profiles from a sample realisation of each ensemble, a *u* velocity snapshot at mid-canopy height (11 m) before ignition and after ignition showing the interaction of wind flow with the fire. Note the disaggregated *u* velocities in the Forest Data and 15-m Gaps ensembles.

heterogeneity (Liao *et al.* 2018; Massetti *et al.* 2019; Narine *et al.* 2019) and three-dimensional below-canopy fuel density (Hudak *et al.* 2020). Furthermore, the ability to quantify fuel structure and model physically based fire dynamics motivates an in-depth understanding of the three-dimensional wind and fuel interactions that influence fire behaviour. Combining three-dimensional wind and fuel interactions with quickly assessed remote sensing and machine learning techniques could increase the application and accuracy of data-driven wildfire models (Coen and Schroeder 2013; Coen *et al.* 2013).

Influence of changing the level of detail in fuels descriptions

The Average Fuel realisation had the least amount of fuel detail, where the horizontal fuel mass was spread evenly, creating a continuous layer of low-density fuel rather than individual trees. Conversely, when representing individual trees, the same amount of canopy mass was concentrated into localised areas – 'trees' – leaving gaps in the canopy. Similarly, surface fuel also shifted to denser litter under trees and less dense grass in spaces between trees. Gaps between trees acted as barriers to crown fire spread, which required stronger and more consistent local winds to bridge the gaps. Additionally, the representation of individual trees and litter, in which the fuel density was higher than in the homogenised Average Fuel, slowed fire spread because it took longer to consume fuels of higher densities and push forward spread, behaviour previously observed by Pimont *et al.* (2006). Areas with higher fuel densities also released more heat, resulting in a stronger local vertical motion, which, coupled with longer combustion residence time, resulted in longer periods of updrafts that impeded the forward propagation due to winds in the along-stream direction.

Canopy structure impacted winds because randomly arranged trees imposed variable aerodynamic drag. It is not surprising that winds would be slower within or right behind dense vegetation compared with lower-density vegetation. Although there were gaps in the Average Tree canopy, those gaps were not large enough for the wind to efficiently penetrate and reestablish, and thus the average wind speeds within the canopy were lower (Fig. 1). The lower wind speed within the canopy combined with canopy gaps and higher localised fuel densities of trees all worked to slow or stop canopy fire spread because the weak winds could not push the simulated fire across

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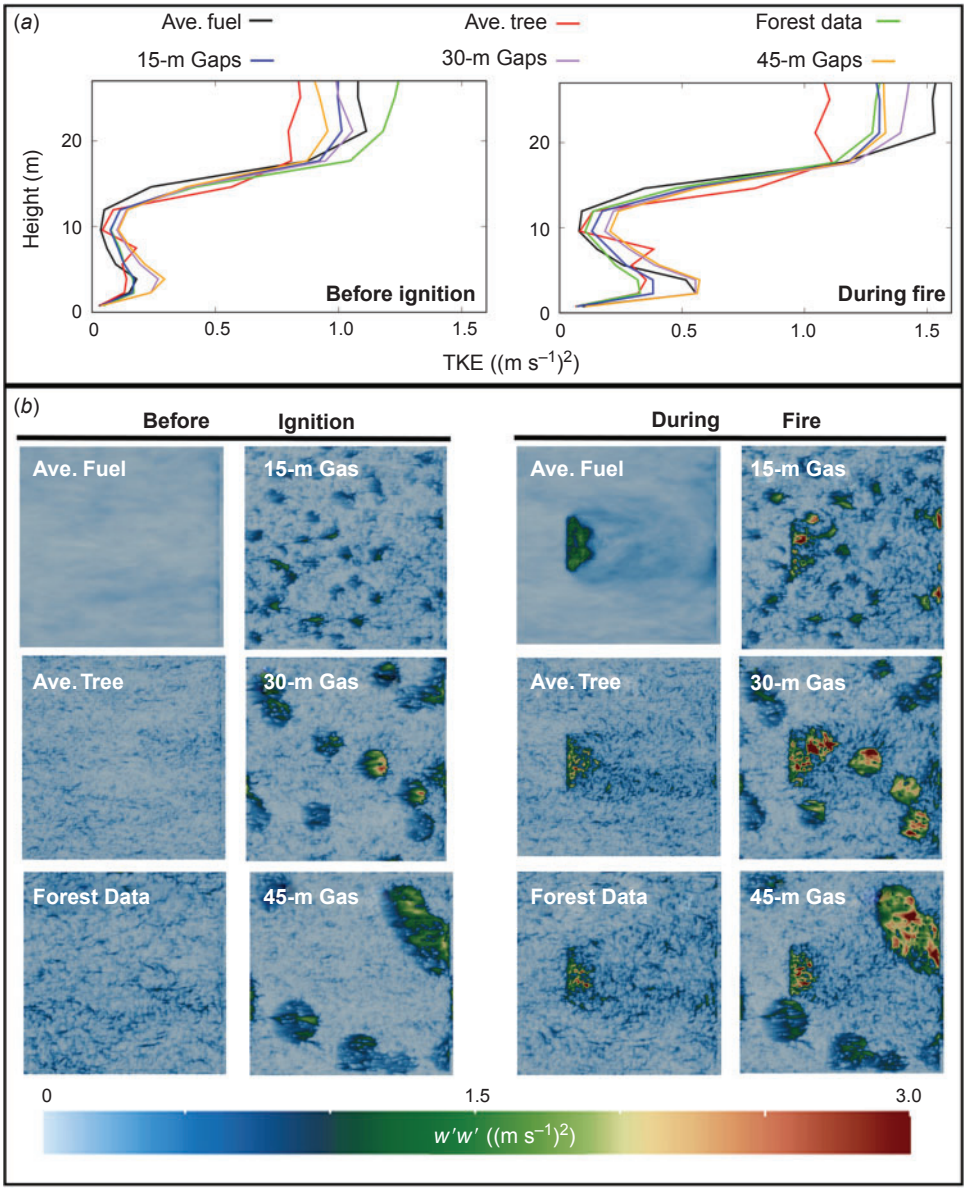

Fig. 5. Average turbulent kinetic energy (TKE) for the 2.5 min before the time of ignition is plotted on the left in panel (*a*) and the average TKE for the 2.5 min after ignition on the right of panel (*a*). Panel (*b*) shows the average $w'w'$ magnitude for the 2.5 min before ignition (left) compared with the 2.5 min following ignition (right) at the mean canopy height of 10 m for a sample realisation from each ensemble.

the gaps and the buoyancy-induced flow was less likely to lean enough to the side to ignite a neighbouring tree.

Describing the variation among the trees

When considering differences between the Forest Data and Average Tree ensembles, the additional representation of fuel fidelity and therefore variation among trees resulted in a further decrease in fire spread, heat release per unit area and area burned. Using heterogeneous tree sizes and shapes meant trees were interacting with the wind field over a larger vertical extent than an averaged canopy or as a characteristic tree. This essentially broke up the larger-scale wind patterns into tree and gap-scale patterns. The level of explicit detail related to the canopy structure influenced simulated winds and turbulence; similarly to Boudreault *et al.* (2014), greater canopy representation resulted in a higher level of fine-scale turbulence (Fig. 4). For example, the presence of low hanging branches or smaller trees in the forest data ensemble disrupted dominant winds, especially near the surface, resulting in the lowest subcanopy wind speeds (Fig. 1*b*). Low wind speeds below the canopy hindered both surface and crown fire spread. Interestingly, complex canopy-driven disruptions to dominant wind flow were noticeable without fire as well as with fire when buoyant wind dynamics caused high-speed horizontal winds to feed the fire

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from multiple directions (Fig. 4). These findings contrast with earlier studies that reported little change in overall turbulent kinetic energy associated with small-scale heterogeneity because vertical shear instabilities typically dominated (Patton 1997; Pimont *et al.* 2011). Our results suggest that even if the fine-scale turbulence was only a marginal contribution to the total kinetic energy budget, the turbulent features associated with small-scale heterogeneity can impact fire behaviour through their influence on both instantaneous local flows and reaction rates.

Influences of fuel density heterogeneity

The wind and fire behaviour also responded to a heterogeneous density of canopy fuel, suggesting that including canopy fuel heterogeneity in forest inventory databases or fuel class descriptions may help fire behaviour forecasts. The increased continuity of canopy fuel in densely forested regions and the increased surface and canopy wind speeds generated by the large gaps resulted in increased forward spread and area burned. The small distance between adjacent trees in aggregated canopies reduced the barriers to active crown fire spread. Likewise, surface fuel continuity increased with less-dense and faster-burning grasses. In addition, as canopy gap size increased, winds could penetrate through the canopy, resulting in increased wind velocity and fire spread.

Our results show that large openings in the canopy allow large-scale wind entrainment below the canopy, similarly to Dupont *et al.* (2011) and Pimont *et al.* (2011), and push the fire front along despite the increased fuel heterogeneity. To visualise how these openings allowed wind turbulence to pass vertically through the canopy, we examined the magnitude of the vertical variance of velocity ($w'w'$) 2.5 min before the fire was ignited and 2.5 min after ignition (Fig. 5). Using $w'w'$ allowed us to visualise the persistence of positive and negative vertical fluctuations from the mean and to identify areas of strong variations. The areas of large $w'w'$ corresponded to large canopy openings. Moreover, there was a larger increase of $w'w'$ and TKE during the fire (Fig. 5) for the 30- and 45-m Gap ensembles. Corresponding increases in $u'u$ and $v'v'$ (not shown) accompanied increases in $w'w'$. Large gaps in the canopy acted to increase wind entrainment, shear stress above the canopy shown as increased windspeed in Fig. 1*c*, and therefore TKE before and especially during combustion, thus allowing larger and consistent wind structures to interact with the fire (Fig. 5). This ability to move air in and out of the openings and an increase in the cross-stream wind turbulence ($v'v'$) also helped to maintain a larger fire line width (Hilton *et al.* 2015).

The non-monotonic relationship between correlation length of fuel variability and fire behaviour metrics, which rebounded at large length scales, illustrated that below a certain gap size, changes to canopy and subcanopy winds were not strong enough to change fire behaviour. Studies of wind interaction with forest canopies suggest that for winds to re-equilibrate to the absence of trees, a length of ~22 to 30 times the average canopy height is needed (Lee 2000; Pimont *et al.* 2018). To induce canopy and subcanopy turbulent wind structures, a length of 1 to 5 times the canopy height appears to be necessary (Pimont *et al.* 2011; Parsons *et al.* 2017). At 1.8 to 2.6 times the average canopy height, the 30- and 45-m Gap ensembles resulted in the canopy and subcanopy wind turbulence structures that influenced fire behaviour. In contrast, the ratio between gap length and canopy height for the 15-m Gap ensemble was not enough for the canopy and subcanopy turbulent winds to develop.

We note that we have focused on a ponderosa pine forest with circular canopy gaps of different sizes under low-velocity wind conditions, which demonstrated the dominant role that forest canopy heterogeneity has on effective wind conditions driving fire behaviour. However, many different forest types and conditions will likely impart unique signatures on fire behaviour such as the level of surface fuel homogenisation. A supplementary analysis (see supplementary material) comparing a homogenised surface fuel configuration with our heterogenous grass and litter surface fuel conditions demonstrates a strong influence of surface fuel conditions. Yet for our simulations, surface fuel homogeneity or heterogeneity does not significantly affect the relationship between fire behaviour metrics and fuel density variability or the length scales of that variability. We therefore hypothesise that fuel variability and the spatial length scales of that variability will influence fire behaviour in predictable ways. For example, greater wind velocities associated with more extreme burning conditions would dampen the effects of spatial variability on fire behaviour (e.g. Sieg *et al.* 2017). In contrast, increased canopy height could strengthen the relationship. Additionally, the overall domain canopy density could play a role in the strength of this relationship, where lower forest densities could weaken the effects of spatial fuel variability on fire behaviour.

Conclusions

We demonstrated that fuel variability and spatial characterisation of fuel density influenced simulated fire behaviour. Greater detail in fuel representation resulted in increasingly fine-scale wind discontinuities, which reduced fire spread and area burned. Likewise, when introducing variability in tree size and shape, the strength of fire behaviour metrics decreased. Spatial scales of fuel variability were also instrumental in the interaction of wind and fuel variability in determining fire spread. We observed a non-monotonic relationship between correlation length of fuel variability and fire metrics, all of which decreased with increasing correlation length up to 10 m but increased with correlation lengths above 10 m. Wind entrainment associated with large, sparse canopy patches resulted in both mean and localised wind speeds and faster fire spread. Furthermore, the turbulent wind conditions in large openings resulted in a disproportional increase in TKE and crosswinds that maintain fire line width.

The use of ensembles with equally probable spatial fuel distributions to characterise fire behaviour was necessary given the range of outcomes. Although mean behaviour for each ensemble was identified, significant overlap existed among individual realisations from different ensembles, highlighting the limitation of drawing conclusions from a single model realisation. Nevertheless, this research clearly shows how both the level of detail used to represent fuels and the inherent aggregation in canopy fuels influenced potential fire behaviour. Fuel characterisation that moves beyond spatially averaged descriptions to include increased spatial fidelity and effective wind description associated with characteristic fuel heterogeneity will better constrain fire behaviour uncertainty.

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Conflicts of interest

The authors declare no conflicts of interest.

Acknowledgements

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ATTACHMENT I

Flathead rolls out forest plan

By SAMUEL WILSON The Daily Inter Lake | Posted: Thursday, March 5, 2015 8:03 pm

Flathead National Forest's revision of its forest plan is being released today for public comment.

The forest plan revision is designed to provide a blueprint for 15 years' worth of management on the 2.4-million-acre Flathead Forest. The forest's current plan dates back to 1986 and was only intended to have a lifespan of 10 to 15 years.

"Right now, the point is to get the public's feedback," project leader Joe Krueger said during a meeting Thursday with the Daily Inter Lake Editorial Board. "This is a starting point."

Preparing the latest revision began in late 2013, based on a 2012 planning rule that requires forest plans to equally incorporate ecological, social and economic sustainability.

The revised plan recommends 188,206 acres of new designated wilderness, largely in the Jewel Basin area east of the Flathead Valley and the Tuchuck-Whale Creek area in the North Fork. The Flathead Forest already has 1,072,219 acres of wilderness.

The plan calls for about 28 million board-feet of timber production each year, part of a total of 30 million to 34 million board-feet for all wood products. Currently the Flathead Forest produces between 27 million and 30 million board-feet of wood products per year.

The release of the plan today kicks off a 60-day period for public comment that includes a series of public meetings from March 17 to April 15.

Timber production lands, occupying 30.8 percent of the total area of the forest in the revised plan, are divided up into three categories, corresponding to the degree of wildlife habitat protection. The highest levels of timber production could take place on 169,068 acres, mainly in the Salish Mountains to the west.

Krueger said planners paid extra attention to accommodating existing backcounty uses, which account for over one-eighth of the total forest acreage. The plan designates 148,323 acres for nonmotorized, year-round use, 97,743 acres for snowmobile use and 50,160 acres for motorized year-round use on designated routes.

The plan proposes a change in snowmobiling areas by expanding access between Canyon Creek and Big Creek up the North Fork while reducing snowmobile use in the Sullivan Creek, Slide Creek and Tin Creek areas.

Other recreation areas, such as mountain biking trails, would occupy 33,360 acres.

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A major component of the plan is a proposed amendment that directs management of grizzly bear habitat in anticipation of the animal's eventual delisting.

Currently, grizzlies are a threatened species under the federal Endangered Species Act, but the recovery of grizzly populations in the Northern Continental Divide Ecosystem has opened up the possibility of a delisting by the U.S. Fish and Wildlife Service.

Rob Carlin, a resources, planning, fire and staff officer with the Flathead Forest, said the management strategy will allow the Forest Service to begin implementing conservation measures if the bears are delisted. The U.S. Fish and Wildlife Service could begin work to delist the species once the draft environmental impact statement is rolled out.

Krueger spoke highly of the collaborative process used for the development of the plan, in which a broad cross-section of stakeholders was invited to participate in talks beginning in 2006.

"We didn't reach a grand bargain ... but we did find out what they didn't like, and that was very helpful," he said.

By forging some compromises, the Forest Service hopes to avoid lawsuits, which are frequently lodged against the agency when it approves a new plan or project. Those protracted court battles are costly and can hold up projects for years.

"There's also a ripple effect of litigation that affects all of our projects," Carlin said. He provided the example of a court determination that the agency misinterpreted habitat requirements, forcing forest officials to revisit other projects to ensure the same mistake is not repeated.

Krueger added, "You have to be very sharp in knowing the legal landscape as a planner, when you're not a lawyer."

Krueger singled out Ron Cron, a Kalispell mechanic and mountain bike enthusiast, as "one of the big winners" who participated extensively in the planning process and offered constructive ideas. Cron has for years been trying to establish a mountain biking trail system at Crane Mountain. The new revision incorporates portions of his project.

As federal funding for national forests continues to dwindle, partnerships are growing in importance as sources of revenue. Krueger said a private company has already agreed to bankroll a "hut-to-hut" system of backcountry shelters near Tally Lake.

Krueger noted the onerous cost of developing the forest plan itself, which he said comes in at about $800,000 per year. In part, this pays for a team of local experts including a recreation specialist, wildlife biologist, silviculturist and aquatic specialist.

ATTACHMENT I

Public comments received during the next two months will be used to develop alternatives by June. Krueger anticipates releasing a draft environmental impact statement by January 2016, followed by a 90-day comment period.

“For that process, we are required to formally respond to each comment,” Krueger said, adding that failure to make relevant corrections to the plan could wind up costing the agency in court if the plan is litigated.

From there, the agency hopes to release the final environmental statement by January 2017 with a final decision coming in June.

And while that might not exactly seem like a fast track, Krueger said it is an ambitious schedule compared with other forest plans.

“It’s not a quick process, but we’re doing it faster than anyone I know,” he said. “No one’s done this in the time frames we’re predicting.”

The proposed action for the revised forest plan can be accessed online at www.fs.usda.gov/goto/flathead/fpr.

Reporter Samuel Wilson can be reached at 758-4407 or by email at swilson@dailyinterlake.com

Schedule of Proposed Action (SOPA)
01/01/2010 to 03/31/2010

Flathead National Forest

ATTACHMENT J

This report contains the best available information at the time of publication. Questions may be directed to the Project Contact.

Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact
R1 - Northern Region, Occurring in more than one Forest (excluding Regionwide)					
Forest Plan Revision, Lolo, Bitterroot and Flathead National Forests CE	- Land management planning	In Progress: Scoping Start 05/10/2002	Expected:09/2010	09/2010	Joseph Krueger 406-758-5243 jkrueger@fs.fed.us
	Description: Forest Plan Revision **Web Link:** http://www.fs.fed.us/r1/wmpz/				
	Location: UNIT - Bitterroot National Forest All Units, Flathead National Forest All Units, Lolo National Forest All Units. STATE - Montana. COUNTY - Flathead, Granite, Lake, Mineral, Missoula, Ravalli, Sanders. Western Montana.				
Flathead National Forest, Occurring in more than one District (excluding Forestwide)					**R1 - Northern Region**
CHR Motorized Route and Area Designation Project EA	- Recreation management - Road management	In Progress: 215 Comment Period Legal Notice 07/04/2009	Expected:03/2010	06/2010	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: Restrict and designate a system of motorized roads, trails and areas that continue to provide access to the NF Flathead and MF Flathead Rivers and Hungry Horse Reservoir as well as manage motorized use adj. to Columbia Falls and Hungry Horse				
	Location: UNIT - Hungry Horse Ranger District, Glacier View Ranger District. STATE - Montana. COUNTY - Flathead. Hungry Horse and Glacier View Ranger Districts, Flathead National Forest.				
Flathead National Forest Glacier View Ranger District (excluding Projects occurring in more than one District)					**R1 - Northern Region**
Mt. Hefty Remote Repeater Site CE	- Special use management	Completed	Actual: 10/01/2009	10/2009	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: New repeater site for the U.S. Border Patrol				
	Location: UNIT - Glacier View Ranger District. STATE - Montana. COUNTY - Flathead. On a ridge approximately 1 mile southeast of Mt. Hefy in the northern-most portion of the Glacier View Ranger District.				

Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact
Flathead National Forest **Glacier View Ranger District (excluding Projects occurring in more than one District)**					**R1 - Northern Region**
Sekokini Springs Fish Hatchery Improvement Project EA	- Wildlife, Fish, Rare plants	In Progress: Scoping Start 11/25/2009 Est. 215 Comment Period Legal Notice 03/2010	Expected:06/2010	09/2010	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: The proposed project would renovate the existing hatchery and outdoor facilities at the Sekokini Springs site for use as a westslope cutthroat trout experimental rearing and isolation facility.				
	Location: UNIT - Glacier View Ranger District. STATE - Montana. COUNTY - Flathead. Middle Fork Flathead River (near Blankenship Bridge).				
Flathead National Forest **Hungry Horse Ranger District (excluding Projects occurring in more than one District)**					**R1 - Northern Region**
Desert Mountain Communication Site CE ***NEW LISTING***	- Special use management	Developing Proposal Est. Scoping Start 01/2010	Expected:02/2010	07/2010	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: Adding a generator room to an existing building and building a new tower				
	Location: UNIT - Hungry Horse Ranger District. STATE - Montana. COUNTY - Flathead. Ridgeline between Emery Creek and Abbott Creek.				
Kalispell Line Valve 5 to 6 Loop Natural Gas Pipeline Project EIS	- Special use management	On Hold	N/A	N/A	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: A proposal by Northwestern Energy to install 12 miles of buried 12" diameter natural gas pipeline near the existing line between the valve stations at Marias Pass and at Nimrod (near the junction of Bear Creek and the Middle Fork Flathead River)				
	Location: UNIT - Hungry Horse Ranger District. STATE - Montana. COUNTY - Flathead. Highway 2 Corridor between Marias Pass and the junction of the Middle Fork Flathead R. and Bear Creek.				
Middle Fork Fuels Reduction Project EA	- Wildlife, Fish, Rare plants - Fuels management	In Progress: 215 Comment Period Legal Notice 11/06/2009	Expected:01/2010	07/2012	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: Mechanical/hand fuels reduction activities within the wildland-urban interface area near the Middle Fork Flathead River (prescribed burning as well)				
	Location: UNIT - Hungry Horse Ranger District. STATE - Montana. COUNTY - Flathead. Near Highway 2 and the Middle Fork Flathead River from Marias Pass to Nyack Flats.				

Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact
Flathead National Forest	**Spotted Bear Ranger District (excluding Projects occurring in more than one District)**				**R1 - Northern Region**
Soldier Addition EA	- Forest products - Vegetation management (other than forest products) - Fuels management	In Progress: 215 Comment Period Legal Notice 07/31/2009	Expected:01/2010	07/2010	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: Treat stands susceptible to mountain pine beetle infestation (proactively and responsive). Additionally, promote release, growth, and regeneration of long-lived seral species to maintain and enhance forest resilence to future disturbances. **Web Link:** http://www.fs.fed.us/r1/flathead/nepa/soldier_addition/ea/ea_index.htm				
	Location: UNIT - Spotted Bear Ranger District. STATE - Montana. COUNTY - Flathead. Battery Creek to Bunker Creek.				
Spotted Bear River Project EA	- Wildlife, Fish, Rare plants - Forest products - Vegetation management (other than forest products) - Fuels management - Road management	In Progress: Scoping Start 11/04/2009 Est. 215 Comment Period Legal Notice 05/2010	Expected:08/2010	07/2012	Michele Draggoo 406-387-3827 mdraggoo@fs.fed.us
	Description: Vegetation treatments to address current and expected mortality from insects and diseases and to create or maintain forest conditions that are more resilient in the face of future disturbances (primarily wildfire, disease or insect infestations).				
	Location: UNIT - Spotted Bear Ranger District. STATE - Montana. COUNTY - Flathead. Spotted Bear River drainage on the Spotted Bear Ranger District.				

Flathead National Forest	**Swan Lake Ranger District (excluding Projects occurring in more than one District)**				**R1 - Northern Region**
Blacktail Communication Site CE ***NEW LISTING***	- Special use management	Developing Proposal Est. Scoping Start 01/2010	Expected:06/2010	07/2010	Andrew Johnson 406-837-7507 andrewjohnson@fs.fed.us
	Description: Authorize a new tower and equipment building within boundary of existing communication site				
	Location: UNIT - Swan Lake Ranger District. STATE - Montana. COUNTY - Flathead. LEGAL - T26N R21W. Island Unit portion of the Swan Lake Ranger District, Flathead National Forest.				

Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact
Flathead National Forest	**Swan Lake Ranger District (excluding Projects occurring in more than one District)**				**R1 - Northern Region**
Blacktail Snotel Construction Project CE	- Special use management	In Progress: 215 Comment Period Legal Notice 10/01/2009	Expected:06/2010	06/2010	Andrew Johnson 406-837-7507 andrewjohnson@fs.fed.us
	Description: To authorize the Natural Resources Conservation Service to construct an automated SNOTEL site at the current location of the Blacktail Snowcourse. Site will encompass approximately 1.0 acres of area plus a buffer zone of 400 feet in all directions.				
	Location: UNIT - Swan Lake Ranger District. STATE - Montana. COUNTY - Flathead. LEGAL - Project located in T26N, R21W, Section 30. Flathead County, Montana. Island Unit of the Swan Lake Ranger District.				
Crane Mountain Trail System Expansion CE ***NEW LISTING***	- Recreation management	Developing Proposal Est. Scoping Start 01/2010	Expected:05/2010	08/2010	Andrew Johnson 1-406-837-7507 andrewjohnson@fs.fed.us
	Description: Improving non-motorized trail opportunities in the urban interface **Web Link:** http://www.fs.fed.us/r1/flathead/				
	Location: UNIT - Swan Lake Ranger District. STATE - Montana. COUNTY - Lake. LEGAL - T25N R18W, T26N R19W. Swan Lake Ranger District, Crane Mountain area west of Swan Lake.				
Island Unit Trails EA	- Recreation management	In Progress: Scoping Start 10/18/2007 Est. 215 Comment Period Legal Notice 04/2010	Expected:07/2010	08/2010	Andrew Johnson 406-837-7507 andrewjohnson@fs.fed.us
	Description: Proposed additions to Swan Lake Ranger District trail systems in the Island Unit portion of the Swan Lake Ranger District.				
	Location: UNIT - Swan Lake Ranger District. STATE - Montana. COUNTY - Flathead. LEGAL - T26N R22W. Island Unit of the Swan Lake Ranger District, southwest of Kalispell, Montana.				
Kerr Mountain Prescribed Fire CE	- Fuels management	In Progress: 215 Comment Period Legal Notice 05/09/2009	Expected:02/2010	04/2010	John Ingebretson 406-837-7518 jingebretson@fs.fed.us
	Description: Prescribed burn within the Dayton Watershed.				
	Location: UNIT - Swan Lake Ranger District. STATE - Montana. COUNTY - Lake. LEGAL - Sections 29 and 32, T26NR21W. Island Unit of the Swan Lake Ranger District, Flathead National Forest, southwest of Kalispell, MT.				

Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact
Flathead National Forest **Swan Lake Ranger District (excluding Projects occurring in more than one District)**					**R1 - Northern Region**
Strawberry Lake, Napa Point, Cold Lakes, and Turquoise Lake Trails Reconstruction CE	- Recreation management	Developing Proposal Est. Scoping Start 01/2010	Expected:03/2010	06/2010	Andrew Johnson 406-837-7507 andrewjohnson@fs.fed.us
	Description: Reconstruct the Stawberry Lake, Napa Point, Cold Lakes, and Turquoise Lake Trails including rerouting some sections of these trails. Also conduct heavy maintenance, including reconstructing tread, drainage structures, and placing new waterbars.				
	Location: UNIT - Swan Lake Ranger District. STATE - Montana. COUNTY - Flathead, Missoula. LEGAL - T28N, R19W, Sections 14 and 15 for Strawberry Lake; T23N, R17W, Section 32 for Napa Point; T21N, R18W, Sections 23 and 24 for Cold Lakes; T19N, R18W, Sections 35 and 36 for Turquoise Lake. Jewel Basin Hiking Area, Napa Point, Turqoise Lake and Cold Lakes Trails in the Swan Valley.				
Summit Mountain Pine Beetle Salvage Project EA	- Forest products	Completed	Actual: 10/02/2009 10/02/2009	11/2009	Joleen Dunham 406-837-7510 jdunham@fs.fed.us
	Description: A project to salvage trees affected by the mountain pine beetle on an estimated 1309 acres of NFS lands. Project will utilize 0.8 miles of existing road, 0.5 miles of skid trails and 3.1 miles of temporary road construction to access affected timber.				
	Location: UNIT - Swan Lake Ranger District. STATE - Montana. COUNTY - Missoula. LEGAL - T19N R16W Sections 2, 11, 12, 13, 14, 22, 23, and 24; T19N R15W Section Section 18. National Forest System lands south of Holland Lake to the hydrologic divide adjacent to the Lolo National Forest in the Swan Valley; east of Highway 83 including areas adjacent to Pierce Lake.				
Flathead National Forest **Tally Lake Ranger District (excluding Projects occurring in more than one District)**					**R1 - Northern Region**

Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact
Flathead National Forest	**Tally Lake Ranger District (excluding Projects occurring in more than one District)**				**R1 - Northern Region**
Ashley-Herrig Resource Management Project EA	- Recreation management - Wildlife, Fish, Rare plants - Forest products - Vegetation management (other than forest products) - Fuels management - Watershed management - Facility management - Road management	Completed	Actual: 10/22/2009	07/2010	Bryan Donner 406-758-3508 bdonner@fs.fed.us
	Description: A project to improve forest tree structure and species composition, reduce hazardous fuels, maintain and improve wildlife habitat, improve recreation opportunities, and improve water quality and aquatic habitat. **Web Link:** http://www.fs.fed.us/r1/flathead/nepa/ashley_herrig/index.htm				
	Location: UNIT - Tally Lake Ranger District. STATE - Montana. COUNTY - Flathead. LEGAL - T28N, R23W; T28N, R24W; T28N, R25W; T29N, R23W; T29N, R24W; T29N, R25W;. The project area is located in the vicinity of Ashley Lake and Herrig Creek on the south part of the Tally Lake Ranger District.				
Big Mountain Power Line Relocation Project CE	- Special use management	Completed	Actual: 08/06/2009	09/2009	Bryan Donner 406-758-3508 bdonner@fs.fed.us
	Description: Flathead Electric is proposing to relocate about 2130 feet of underground electric line to a more accessible location. The proposal also includes the installation of five underground concrete vaults to be used for cable pulling and conduit access.				
	Location: UNIT - Tally Lake Ranger District. STATE - Montana. COUNTY - Flathead. LEGAL - Sections 25 and 36, T32N, R22W. Project is located on the Whitefish Mountain Resort five miles north of Whitefish, Montana.				
Lemonade Springs and Island Meadows Range Allotments Project EA	- Grazing management	In Progress: Scoping Start 12/14/2005 Est. 215 Comment Period Legal Notice 01/2010	Expected:02/2010	06/2010	Bryan Donner 406-758-3508 bdonner@fs.fed.us
	Description: An analysis to update the Allotment Management Plans for the two allotments consistent with forest plan goals and objectives while protecting natural resources.				
	Location: UNIT - Tally Lake Ranger District. STATE - Montana. COUNTY - Flathead. LEGAL - T29N R25W (multiple sections). Approximately 20 air miles southwest of Whitefish, MT.				

Project Name	Project Purpose	Planning Status	Decision	Expected Implementation	Project Contact

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This report contains the best available information at the time of publication. Questions may be directed to the Project Contact.

ATTACHMENT K

FOR PUBLICATION

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

BARK; CASCADIA WILDLANDS; OREGON WILD, *Plaintiffs-Appellants*, v. UNITED STATES FOREST SERVICE, a federal agency, *Defendant-Appellee*, HIGH CASCADE, INC., *Intervenor-Defendant-Appellee.*	No. 19-35665 D.C. No. 3:18-cv-01645-MO ORDER AND OPINION

Appeal from the United States District Court
for the District of Oregon
Michael W. Mosman, District Judge, Presiding

Argued and Submitted December 10, 2019
Seattle, Washington

Filed May 4, 2020

Before: Susan P. Graber, Marsha S. Berzon, and Stephen A. Higginson,* Circuit Judges.

* Stephen A. Higginson, United States Circuit Judge for the U.S. Court of Appeals for the Fifth Circuit, sitting by designation.

ATTACHMENT K

Order;
Opinion by Judge Higginson;
Concurrence by Judge Graber

SUMMARY[**]

Environmental Law

The panel granted appellants' request to publish the unpublished Memorandum Disposition with modifications; and reversed the district court's summary judgment in favor of the U.S. Forest Service in an action alleging violations of the National Environmental Policy Act and National Forest Management Act.

The Crystal Clear Restoration ("CCR") Project is a forest management effort and timber sale affecting 11,742 acres in Mt. Hood National Forest.

The panel held that the Forest Service's determination that the CCR Project did not require an Environmental Impact Statement ("EIS") was arbitrary and capricious for two independent reasons. First, the effects of the Project were highly controversial and uncertain, thus mandating the creation of an EIS. *See* 40 C.F.R. § 1508.27(b)(4) & (5). Second, the Forest Service failed to identify and meaningfully analyze the cumulative impacts of the Project.

[**] This summary constitutes no part of the opinion of the court. It has been prepared by court staff for the convenience of the reader.

Because an EIS was required, and because the findings in the EIS could prompt the Forest Service to change the scope of the Project or the methods it planned to use, the panel did not reach the appellants' other claims. The panel remanded to the Forest Service for further proceedings.

Judge Graber concurred in full in the judgment and in all but section III-B of the majority opinion. She agrees that an EIS was required, but would not reach whether the environmental assessments' discussion of cumulative impacts also was arbitrary and capricious.

COUNSEL

Brenna Bell (argued), Portland, Oregon; Nick Cady, Eugene, Oregon; for Plaintiffs-Appellants.

Jeffrey S. Beelaert (argued), Shaun M. Pettigrew, and Krystal-Rose Perez, Attorneys; Eric Grant, Deputy Assistant Attorney General; Jeffrey Bossert Clark, Assistant Attorney General; Environment and Natural Resources Division, United States Department of Justice, Washington, D.C.; Stephen A. Vaden, General Counsel; Val J. McLam Black, Senior Counsel, United States Department of Agriculture, Washington, D.C.; for Defendant-Appellee.

Lawson E. Fite (argued), and Sara Ghafouri, American Forest Resource Council, Portland, Oregon, for Intervenor-Defendant-Appellee.

ATTACHMENT K

ORDER

Appellants' request to publish the unpublished Memorandum disposition, Docket No. 37, is **GRANTED**. The Memorandum disposition filed April 3, 2020, is redesignated as an authored Opinion by Judge Higginson, with modifications. The time for filing a petition for rehearing and petition for rehearing en banc shall start anew as of the filed date of this Opinion.

OPINION

HIGGINSON, Circuit Judge:

Appellants Bark, Cascadia Wildlands, and Oregon Wild timely appeal the district court's summary judgment in favor of Appellees, the United States Forest Service (USFS) and High Cascade, for claimed violations of the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). We hold that the USFS's determination that the Crystal Clear Restoration (CCR) Project did not require an Environmental Impact Statement (EIS) was arbitrary and capricious and so reverse. We do not reach the NFMA claims.

I.

The CCR Project is a forest management effort and timber sale affecting 11,742 acres in Mt. Hood National Forest. The Project area is partly a moist "transition" climate, and partly a dry "eastside" climate. According to the USFS, forest stands in the area tend to be overstocked as a result of past management practices. When trees are closer together, they are more susceptible to insects and disease and

to high-intensity wildfires. The USFS undertook the CCR Project in order to "provide forest products from specific locations within the planning area where there is a need to improve stand conditions, reduce the risk of high-intensity wildfires, and promote safe fire suppression activities." The USFS plans to achieve these goals in part using a technique called "variable density thinning." This process gives the agency flexibility in choosing which trees to cut, thereby allowing the USFS to create variation within an area of forest so that the stands "mimic more natural structural stand diversity." The USFS plans to leave an average canopy cover of 35–60%, with a minimum of 30% where the forest is more than 20 years old.

"NEPA imposes procedural requirements designed to force agencies to take a 'hard look' at environmental consequences" of their proposed actions. *League of Wilderness Defs./Blue Mountains Biodiversity Project v. Connaughton*, 752 F.3d 755, 763 (9th Cir. 2014) (internal quotation marks omitted). Agencies must prepare an EIS for federal actions that will "significantly affect[] the quality of the human environment." 42 U.S.C. § 4332(2)(C). To determine whether a proposed action will have a significant effect on the quality of the human environment, agencies must prepare an Environmental Assessment (EA) that "[b]riefly provide[s] sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact." 40 C.F.R. § 1508.9(a)(1). An EIS is required when this process raises "substantial questions" about whether an agency action will have a significant effect. *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1212 (9th Cir. 1998); *see also Native Ecosystems Council v. U.S. Forest Serv.*, 428 F.3d 1233, 1238–39 (9th Cir. 2005). "If the agency concludes in the EA that there is no significant effect from

the proposed project, the federal agency may issue a finding of no significant impact ('FONSI') in lieu of preparing an EIS." *Native Ecosystems Council*, 428 F.3d at 1239 (citing 40 C.F.R. § 1508.9(a)(1); *id.* § 1508.13).

After conducting an EA, the USFS determined that the CCR Project had no significant effects. It therefore issued a FONSI and did not prepare an EIS.

Appellants filed a complaint against the USFS bringing claims under NEPA and the NFMA. The NEPA claim alleged that the USFS did not undertake a proper analysis of the environmental impacts of the Project or of alternatives to the Project. The NFMA claim alleged that the USFS failed to comply with two forest plans and other guidance documents governing the Project area as required by the NFMA. The district court granted summary judgment to Appellees on all claims. Appellants timely appealed.

II.

We review the district court's grant of summary judgment de novo. *Ctr. for Biological Diversity v. Ilano*, 928 F.3d 774, 779 (9th Cir. 2019). The Administrative Procedure Act (APA), 5 U.S.C. § 706(2)(A), provides the governing standard for courts reviewing an agency's compliance with NEPA and the NFMA. *Native Ecosystems Council*, 428 F.3d at 1238. Under the APA, we may overturn an agency's conclusions when they are "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706(2)(A). "An agency action is arbitrary and capricious if the agency has: relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be

ascribed to a difference in view or the product of agency expertise." *WildEarth Guardians v. U.S. E.P.A.*, 759 F.3d 1064, 1069–70 (9th Cir. 2014) (quoting *Ctr. for Biological Diversity v. U.S. Bureau of Land Mgmt.*, 698 F.3d 1101, 1109 (9th Cir. 2012)). An agency's factual determinations "must be supported by substantial evidence." *Connaughton*, 752 F.3d at 759.

In reviewing an agency's finding that a project has no significant effects, courts must determine whether the agency has met NEPA's hard look requirement, "based [its decision] on a consideration of the relevant factors, and provided a convincing statement of reasons to explain why a project's impacts are insignificant." *In Def. of Animals v. U.S. Dep't of Interior*, 751 F.3d 1054, 1068 (9th Cir. 2014) (alteration in original) (quoting *Envtl. Prot. Info. Ctr. v. U.S. Forest Serv. (EPIC)*, 451 F.3d 1005, 1009 (9th Cir. 2006)). The term "significant" includes considerations of both the context and the intensity of the possible effects. 40 C.F.R. § 1508.27. "Context simply delimits the scope of the agency's action, including the interests affected." *In Def. of Animals*, 751 F.3d at 1068 (quoting *Nat'l Parks & Conservation Ass'n v. Babbitt*, 241 F.3d 722, 731 (9th Cir. 2001), *abrogated in part on other grounds by Monsanto Co. v. Geertson Seed Farms*, 561 U.S. 139, 157 (2010)). Consideration of context involves analysis "in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality." 40 C.F.R. § 1508.27(a). "[I]n the case of a site-specific action, significance . . . usually depend[s] upon the effects in the locale rather than in the world as a whole." *Id.*

Consideration of intensity "refers to the severity of impact." *Id.* § 1508.27(b). NEPA regulations list ten non-exhaustive factors that inform an agency's intensity

determination, including "[t]he degree to which the effects on the quality of the human environment are likely to be highly controversial," *id.* § 1508.27(b)(4), "[t]he degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks," *id.* § 1508.27(b)(5), and "[w]hether the action is related to other actions with individually insignificant but cumulatively significant impacts," *id.* § 1508.27(b)(7). The regulations explain that "[s]ignificance exists if it is reasonable to anticipate a cumulatively significant impact on the environment," and "cannot be avoided by . . . breaking [an action] down into small component parts." *Id.* "When substantial questions are raised as to whether a proposed project 'may cause significant degradation of some human environmental factor,' an EIS is required." *In Def. of Animals*, 751 F.3d at 1068.

III.

The USFS's decision not to prepare an EIS was arbitrary and capricious for two independent reasons.

A.

First, the effects of the Project are highly controversial and uncertain, thus mandating the creation of an EIS. *See* 40 C.F.R. § 1508.27(b)(4) & (5) (listing relevant factors for whether an EIS is required, including if the project's effects are "highly controversial" and "highly uncertain"). The stated primary purpose of the CCR Project is to reduce the risk of wildfires and promote safe fire-suppression activities, but Appellants identify considerable scientific evidence showing that variable density thinning will not achieve this purpose. Considering both context and intensity, as required by 40 C.F.R. § 1508.27, this evidence raises substantial questions about the Project's environmental impact, and an

EIS is required. *See, e.g.*, *Blackwood*, 161 F.3d at 1212; *Native Ecosystems Council*, 428 F.3d at 1238–39.

"A project is 'highly controversial' if there is a 'substantial dispute [about] the size, nature, or effect of the major Federal action rather than the existence of opposition to a use.'" *Native Ecosystems Council*, 428 F.3d at 1240 (alteration in original) (quoting *Blackwood*, 161 F.3d at 1212). "A substantial dispute exists when evidence . . . casts serious doubt upon the reasonableness of an agency's conclusions." *In Def. of Animals*, 751 F.3d at 1069 (quoting *Babbitt*, 241 F.3d at 736). "[M]ere opposition alone is insufficient to support a finding of controversy." *WildEarth Guardians v. Provencio*, 923 F.3d 655, 673 (9th Cir. 2019).

The EA explained that the CCR Project will use "variable density thinning" to address wildfire concerns. "In variable density thinning, selected trees of all sizes . . . would be removed." This process would assertedly make the treated areas "more resilient to perturbations such as . . . large-scale high-intensity fire occurrence because of the reductions in total stand density." Variable density thinning will occur in the entire Project area.

Substantial expert opinion presented by the Appellants during the administrative process disputes the USFS's conclusion that thinning is helpful for fire suppression and safety. For example, Oregon Wild pointed out in its EA comments that "[f]uel treatments have a modest effect on fire behavior, and could even make fire worse instead of better." It averred that removing mature trees is especially likely to have a net negative effect on fire suppression. Importantly, the organization pointed to expert studies and research reviews that support this assertion.

Bark also raised this issue: "It is becoming more and more commonly accepted that reducing fuels does not consistently prevent large forest fires, and seldom significantly reduces the outcome of these large fires," citing an article from *Forest Ecology and Management*. Bark also directed the USFS to a recent study published in *The Open Forest Science Journal*, which concluded that fuel treatments are unlikely to reduce fire severity and consequent impacts, because often the treated area is not affected by fire before the fuels return to normal levels. Bark further noted that, while "Bark discussed [during the scoping process] the studies that have found that fuel reduction may actually exacerbate fire severity in some cases as such projects leave behind combustible slash, open the forest canopy to create more ground-level biomass, and increase solar radiation which dries out the understory[,] [t]he EA did not discuss this information."

Oregon Wild also pointed out in its EA comments that fuel reduction does not necessarily suppress fire. Indeed, it asserted that "[s]ome fuel can actually help reduce fire, such as deciduous hardwoods that act as heat sinks (under some conditions), and dense canopy fuels that keep the forest cool and moist and help suppress the growth of surface and ladder fuels . . . ." Oregon Wild cited more than ten expert sources supporting this view. Importantly, even the Fuels Specialist Report produced by the USFS itself noted that "reducing canopy cover can also have the effect of increasing [a fire's rate of spread] by allowing solar radiation to dry surface fuels, allowing finer fuels to grow on . . . the forest floor, and reducing the impact of sheltering from wind the canopy provides."

The effects analysis in the EA did not engage with the considerable contrary scientific and expert opinion; it

instead drew general conclusions such as that "[t]here are no negative effects to fuels from the Proposed Action treatments." Appellants thus have shown a substantial dispute about the effect of variable density thinning on fire suppression. Although it is not our role to assess the merits of whether variable density thinning is indeed effective in the project area to prevent fires, or to take sides in a battle of the experts, *see Greenpeace Action v. Franklin*, 14 F.3d 1324, 1333 (9th Cir. 1992), NEPA requires agencies to consider all important aspects of a problem. *See WildEarth Guardians*, 759 F.3d at 1069–70. Throughout the USFS's investigative process, Appellants pointed to numerous expert sources concluding that thinning activities do not improve fire outcomes. In its responses to these comments and in its finding of no significant impact, the USFS reiterated its conclusions about vegetation management but did not engage with the substantial body of research cited by Appellants. This dispute is of substantial consequence because variable density thinning is planned in the entire Project area, and fire management is a crucial issue that has wide-ranging ecological impacts and affects human life. When one factor alone raises "substantial questions" about whether an agency action will have a significant environmental effect, an EIS is warranted. *See Ocean Advocates v. U.S. Army Corps of Eng'rs*, 402 F.3d 846, 865 (9th Cir. 2005) ("We have held that one of [the NEPA intensity] factors may be sufficient to require preparation of an EIS in appropriate circumstances."). Thus, the USFS's decision not to prepare an EIS was arbitrary and capricious. *See Blackwood*, 161 F.3d at 1213 (holding that conflicting evidence on the effects of ecological intervention in post-fire landscapes made a proposed project highly uncertain, thus requiring an EIS).

B.

The USFS also failed to identify and meaningfully analyze the cumulative impacts of the Project. "Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency . . . undertakes such other actions." 40 C.F.R. § 1508.7. "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." *Id.* "[I]n considering cumulative impact, an agency must provide 'some quantified or detailed information; . . . [g]eneral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.'" *Ocean Advocates*, 402 F.3d at 868 (alterations in original) (quoting *Neighbors of Cuddy Mountain v. U.S. Forest Serv.*, 137 F.3d 1372, 1379–80 (9th Cir. 1998)). "This cumulative analysis 'must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects.'" *Id.* (quoting *Kern v. U.S. Bureau of Land Mgmt.*, 284 F.3d 1062, 1075 (9th Cir. 2002)) (internal quotation marks omitted). We have held that cumulative impact analyses were insufficient when they "discusse[d] only the direct effects of the project at issue on [a small area]" and merely "contemplated" other projects but had "no quantified assessment" of their combined impacts. *Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt.*, 387 F.3d 989, 994 (9th Cir. 2004).

The EA ostensibly analyzed the cumulative effects of the CCR Project, and included a table of other projects that were "considered in the cumulative effects analyses." The cumulative impact analysis is insufficient because there is no

meaningful analysis of any of the identified projects. The table gave no information about any of the projects listed; it merely named them. The section of the EA actually analyzing the cumulative effects on vegetation resources did not refer to any of these other projects. Nor are there any specific factual findings that would allow for informed decision-making. The EA simply concluded that "there are no direct or indirect effects that would cumulate from other projects due to the minimal amount of connectivity with past treatments" and that the Project "would have a beneficial effect on the stands by moving them toward a more resilient condition that would allow fire to play a vital role in maintaining stand health, composition and structure." These are the kind of conclusory statements, based on "vague and uncertain analysis," that are insufficient to satisfy NEPA's requirements. *Ocean Advocates*, 402 F.3d at 869.

The EA also mentioned the possibility of cumulative effects in sections on other specific sub-topics such as fuels management, transportation resources, and soil productivity. These sections similarly relied on conclusory assertions that the Project has "no cumulative effects." When the EA did acknowledge the possibility of the Project's impact, such as in the section that analyzed the Project's effects on spotted owls, it noted only that "[t]imber harvest on federal, tribal, and private land, and utility corridor operations have reduced the amount of suitable habitat . . . on the landscape and could continue to do so in the future," without attempting to quantify the cumulative loss or naming other projects. Yet there were other relevant timber projects to discuss. Appellants pointed out at least three other recent or future timber projects in their comments responding to the EA, but the relevant section of the document limited its analysis to only the Project area and a 1.2-mile buffer surrounding it. Such a small buffer zone fails to distinguish the EA's

cumulative impact analysis from an analysis of the direct effects of the Project. *See Klamath-Siskiyou Wildlands Ctr.*, 387 F.3d. at 997 (assessing cumulative effects at the critical habitat unit scale). The USFS's failure to engage with the other projects identified by Appellants leaves open the possibility that several small forest management actions will together result in a loss of suitable owl habitat. Preventing or adequately mitigating this potential loss is the fundamental purpose of NEPA's requirement that agencies analyze cumulative impacts, and we have no basis in the record to assess whether the USFS has taken the necessary steps to consider this possibility.

Overall, there is nothing in the EA that could constitute "quantified or detailed information" about the cumulative effects of the Project. *Ocean Advocates*, 402 F.3d at 868 (internal quotation marks omitted). The USFS's analysis creates substantial questions about whether the action will have a cumulatively significant environmental impact. Therefore, this factor also requires the USFS to conduct an EIS. *See* 40 C.F.R. § 1508.27(b)(7).

IV.

Because an EIS is required, and because the findings in the EIS could prompt the USFS to change the scope of the Project or the methods it plans to use, we do not reach the Appellants' other claims. We reverse the district court's judgment and remand to the district court with instructions to remand to the USFS for further proceedings consistent with this opinion.

REVERSED and REMANDED.

ATTACHMENT K

GRABER, Circuit Judge, concurring:

I concur in full in the judgment and in all but section III-B of the majority opinion. The project's proposed methodology of variable density thinning is both highly controversial and highly uncertain, so an environmental impact statement is required. I would not reach whether the environmental assessment's discussion of cumulative impacts also was arbitrary and capricious.

ATTACHMENT L

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UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

FRESNO DIVISION

UNITE THE PARKS; SEQUOIA FORESTKEEPER; and EARTH ISLAND INSTITUTE,

Plaintiffs,

v.

UNITED STATES FOREST SERVICE, an agency of the U.S. Department of Agriculture; and UNITED STATES FISH AND WILDLIFE SERVICE, an agency of the U.S. Department of the Interior,

Defendants.

Case No. 1:21−CV−00518−DAD−HBK

DECLARATION OF DR. JOSEPH WERNE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Date: May 18, 2021
Time: 9:30 am
Courtroom: 5

ATTACHMENT L

I, Joseph Werne, declare as follows:

SUMMARY OF QUALIFICATIONS

1. I submit this declaration in support of the Plaintiffs' Motion for Preliminary Injunction in this case regarding Defendants' plans to continue logging and vegetation-management activities in the range of the Southern Sierra Nevada Pacific Fisher (SSN fisher) on the Sierra, Sequoia, and Stanislaus National Forests. I have personal knowledge of the matters stated herein and, if called as a witness, would and could competently testify thereto.

2. I am a research scientist with a Ph.D. in Physics (1993) from the University of Chicago. I have a 34-year science career with a primary emphasis on high-resolution numerical modeling and simulation of atmospheric dynamics. I have 78 scientific publications in refereed journals, book chapters, and conference proceedings. My most-frequently cited works center on two dominant themes: simulation and modeling of buoyant convection (which was my thesis work), and accurate modeling of atmospheric turbulence. Both of these subjects are important for understanding the atmospheric response and feedback to wildland fire. I have co-hosted workshops at the National Center for Atmospheric Research (NCAR) and at the University of Colorado at Boulder on the theory and modeling of atmospheric dynamics. I have presented invited lectures on atmospheric turbulence theory and modeling and high-performance computing across the U.S., in Japan, Italy, England, and elsewhere in Europe. I have served as either the principle investigator or co-investigator on over 20 research and high-performance-computing projects related to atmospheric simulation and modeling. A true and correct copy of my Curriculum Vitae (CV) is attached as Exhibit A.

3. I am currently the co-lead of a working group of assembled experts in wildland-fire theory and modeling. The group's expertise includes fire physics, high-resolution numerical weather-fire simulation, forest ecology, wildlife ecology, and wildfire insurance. The goals of the working group are to: a) integrate and incorporate the current state of the art in each of these disciplines into an improved Wildland-Fire Behavior Assessment tool to aid land-management decision making, and b) apply the results of our wildland-fire-behavior work to improved fire-resilience assessments in California.

4. I serve as the Chief Scientist for Unite the Parks, which is a 501(c)(3) non-profit organization focused on nature preservation, conservation, restoration and advocacy, primarily in the Sierra Nevada and California.

5. I am a lifelong supporter and user of our National Parks and National Monuments, where I frequently camp, hike, climb, and mountain bike, including three times in the Sierra Nevada in 2020. I find my greatest peace, personal clarity, and sense of wonder when outside in nature, especially at night under the stars, far away from city lights. I have plans to return to the Sierra National Forest as soon as this coming summer of 2021.

6. In 2020, I attended the 67th Annual Meeting of the Western Section of The Wildlife Society (2-7 February 2020), which included presentations on the Southern Sierra Nevada Pacific fisher. I also attended the California Fisher Working Group (2 February 2020) and the Southern Sierra Fisher Working Group (3 February 2020) special sessions of The Wildlife Society meeting. At the special sessions I listened to presentations on the latest studies related to the endangered Southern Sierra Nevada Distinct Population Segment (SSN DPS) of the Pacific fisher.

STATEMENT OF OPINION

Overview

7. Old-growth trees are integral to Pacific fisher survival, and to forest fire safety. Fishers give birth and raise babies inside the cavities of large trees, so they need them for reproduction; and our forests need the fire-resistant microclimates that large trees create. Unfortunately, we are increasingly losing old-growth trees to unnaturally large wildland fires that have become more frequent in recent years. California's 2020 fire season was the most destructive in the state's history, continuing a trend of ever-increasing fire size and severity; and the most comprehensive analysis of wildland-fire data to-date suggests land-management practices may be contributing to the problem.

8. In this declaration, my expertise speaks to atmospheric dynamics and how its incomplete consideration in current fuels-reduction treatments can make our forests less fire-resilient, as the best-available science demonstrates. I will describe how current inconsistent treatment of the atmosphere in operational fire models can mislead scientists into believing errant fire-resilience predictions. Until these issues are remedied, current vegetation treatments should be

halted until we better understand their consequences, because claimed increased fire resilience remains unproven. In fact, current practices may be reducing the fire resilience of our forests.

9. Below I provide background information for context related to Pacific fishers and the large trees they need. I describe the primary threat to large trees from fire, namely, crown fires, and I detail how current land-management practices designed to protect large trees from fire can lead to the opposite effect. Finally, I present the latest science, which shows how current fuels-reduction practices can make our forests less firesafe, and I show how operational fire models can mislead us into believing vegetation treatments are effective, when they actually are not.

Background

10. The Pacific fisher is a member of the weasel family with quick reflexes, excellent climbing skills, and exceptional fur. It is a midsize forest carnivore that eats small mammals and is eaten by cougars, bobcats, and coyote. Fisher population numbers have been decimated by historic fur trapping and logging of its old-growth forest habitat, and on May 15, 2020 the Distinct Population Segment (DPS) of the Pacific fisher in the Southern Sierra Nevada (SSN) was listed as endangered by the USFWS (U.S. Fish and Wildlife Service) under the Endangered Species Act.

11. In the forests where Pacific fishers live, fire occurs naturally; and the large trees fishers need for reproduction also help make the forest firesafe. It is well established that large, old-growth trees are able to resist burning because of their thick bark and large-diameter trunks; also, their high canopies create cool microclimate environments that help protect surrounding habitat by blocking the wind, shading the soil, retaining moisture, and significantly lowering surface temperatures (e.g., Binkley et al. 2007, Lesmeister et al. 2019). True and correct copies of the Binkley and Lesmeister papers are attached as Exhibits B and C, respectively. Though they typically number less than 2% of the individual trees in a forest, trees larger than 40 inches in diameter can account for nearly half of a forest's biomass (Lutz et al. 2012). A true and correct copy of this paper is attached as Exhibit D. Unfortunately, for every old-growth tree that remains today, more than seven have already been logged. Compared to historical abundances, only 12% of Sierra Nevada old-growth trees remain (Erman et al. 1996, Vol. II). Therefore, safeguarding our last large trees is critically important for protecting both the fisher's ability to reproduce and the forest's ability to survive wildfire.

Crown Fires Threaten Our Remaining Large Trees

12. Major threats to large trees are overstory crown fires, which occur when treetops ignite during severe burns. Analysis of severe-burn patches in the 2013 Rim Fire found that crown fire disproportionately kills larger trees compared to smaller trees (Lydersen et al. 2016). Removing "ladder fuels" that connect the ground to the overstory is therefore a common-sense practice designed to prevent fires on the forest floor from climbing to the treetops (e.g., PSW-GTR-220). Nevertheless, recent research using detailed high-resolution numerical simulations reports that removing ladder fuels can easily increase the likelihood of crown-fire occurrence, despite being designed to reduce it (Banerjee et al. 2020). The reason for this seemingly counter-intuitive result involves the important role atmospheric motions play, and it demonstrates how focusing solely on forest fuels can make matters worse, if one neglects to also consider how vegetation treatments can increase the oxygen supply to a fire.

Accurate Fire Modeling Must Include Atmospheric Dynamics

13. Current operational fire models are incomplete, because they attempt to characterize complex fire behavior across a landscape using limited resources. In contrast, detailed high-resolution numerical fire simulations on high-performance supercomputers do a much better job, but they are too slow and too expensive for operational use. This is because operational models must rapidly obtain and compare a large number of different ignition and vegetation-treatment scenarios if they are to be useful. Nevertheless, fast models that produce unrealistic results can have catastrophic consequences for forestland management, and below I discuss two examples that demonstrate serious deficiencies with application of all of the USFS (U.S. Forest Service) operational models, including BehavePlus, FARSITE, FlamMap, FVS-FFE, and FSPro.

14. The first example concerns inadequate handling of the wind resistance associated with ladder fuels. When ladder fuels are removed, the ground-level windspeed and turbulent mixing both increase, leading to faster fire spread and greater oxygen-transport efficiency; this, in turn, results in increased fire intensity. As recent high-resolution numerical fire simulations show (e.g., Banerjee et al. 2020, Atchley et al. 2021), in many cases this aerodynamic effect is more important than the fire-dampening effects of the fuels reduction being evaluated. Nevertheless, comparisons using operational fire models do not predict this result because they ignore

aerodynamic differences between model runs with and without ladder fuels, using the same specified windspeed for both cases. For example, see the USFS tutorial, Jones et al. 2010 at page 15, where a constant 20 mph windspeed is specified. (A true and correct copy of this paper is attached as Exhibit E.) The model results are discussed in detail for varying degrees of ladder-fuel removal (e.g., 0, 10, 20, 25, and 100 percent), but all cases are computed with exactly the same 20 mph windspeed. In reality, increasing levels of fuels reduction will be accompanied by higher windspeeds as the sub-canopy wind drag drops, but this is not considered by Jones et al., and this is typical of operational fire-model use. This mistake is repeated in the next example Jones et al. discuss, where on page 22 they state, "The fire scenario was the same," meaning the same constant 20 mph windspeed was again used.

15. Two recent studies using high-resolution numerical fire simulations demonstrate just how consequential neglecting canopy wind-drag effects can be, leading to potentially disastrous results if aggressive ladder-fuel removal is applied. One study is by Atchley et al. 2021, sponsored by the USFS (a true and correct copy of which is included as Exhibit F), and the other is by Banerjee et al. 2020 (a true and correct copy of which is included as Exhibit G). In both papers, separate simulations are performed to compare different fuels configurations, and both papers demonstrate that the removal of ladder fuels reduces the sub-canopy wind drag, ultimately leading to increased fire spread. In other words, they both show how fuels-reduction treatments can increase fire spread, which is the opposite of what the operational model studies predict. Furthermore, the Banerjee et al. 2020 paper goes further and also shows that aggressive ladder-fuel removal increases the likelihood of overstory crown fires compared to more modest ladder-fuel reductions, which is again opposite to operational model-run predictions.

16. From these results, it is clear that evaluating wildland fire resilience using current USFS operational fire-modeling theory is suspect, especially since operational models fail to properly include all of the important effects associated with specified fuels treatments, especially canopy wind resistance, which both Atchley et al. (2021) and Banerjee et al. (2020) show are extremely important. Until operational fire models are updated to include the latest and best-available science, claims of improved fire resilience should be viewed with skepticism, and

treatments should stop until they are carefully validated against more accurate simulation methods. Our forests and the fisher may very-well depend on it.

Missing Fire Physics Can Be More Important than Fuel Load and Severe Weather

17. In addition to the focused process studies like those of Atchley et al. 2021 and Banerjee et al. 2020, realistic high-resolution numerical fire simulations are also used to study the details of real-world fires. Since the simulations require significant computer time, they are done after the fact, but they are helpful for learning aspects of fire behavior that would be otherwise difficult to determine. For example, Coen et al. 2018, also sponsored by the USFS (a true and correct copy of which is included here as Exhibit H) uses high-resolution simulations to deconstruct the 2014 King Fire, and its authors show that fire-induced winds were primarily responsible for the fire's rapid growth and size. In their study, Coen et al. demonstrate that drought and fuel load were secondary effects compared to fire-induced atmospheric motions, which operational fire-behavior models neglect. Two important conclusions from the study are: 1. "… extreme fires need not arise from extreme fire environment conditions," and 2. "… models used in operations do not capture fire-induced winds and dynamic feedbacks so [they] can underestimate megafire events." In other words, the inability of operational models to simulate plume-driven megafires like the 2014 King Fire is not due to climate change or extreme weather events, but instead because of known missing physics in the operational models.

18. Additional evidence that vegetation treatments may be excluding important fire physics is suggested by the most comprehensive study to-date of wildland-fire data, which was conducted by Bradley et al. (2016), a true and correct copy of which is included as Exhibit I. They analyze satellite data for 1500 fires from 1984 to 2014, affecting 23.5 million acres of forestland. Their results show that the more heavily forestland is managed, the more severely it burns, and the least-managed land (i.e., our National Parks and Wilderness Areas) are the most firesafe (correcting for forest type, topography, and climate variables). Other scientific studies find similar results (e.g., Donato et al., 2006; Thompson et al., 2007; Cruz et al., 2014; Zald and Dunn, 2018). This suggests our land-management activities may be making our forestlands less firesafe, not more.

Long-Term Landscape-Resilience Claims are Unproven, and Sometimes They are Wrong

19. Current vegetation treatments advocated by the USFS were defined in 2009 in technical report PSW-GTR-220, and then later they were clarified in 2012 in PSW-GTR-237. Their efficacy for increased long-term, i.e., 30-year, landscape resilience is therefore not directly proven, since they were not practiced 30 years ago. Hence, claims of long-term resilience are theoretical, and they are only as credible as the models used to predict them. Given the results of Atchley et al. 2021, Banerjee et al. 2020, Coen et al. 2018, and Bradley et al. 2016, are we willing to bet the Pacific fisher's future on them?

20. Attempts to evaluate these claimed long-term benefits demonstrate that a) they are *not* based on the best available science and b) they exaggerate or mischaracterize the findings in the references used to justify them. In contrast, the most comprehensive scientific study to date examining forestland-fire data demonstrates that land-management practices are producing forestlands that are less firesafe, not more; see paragraphs 13-18. Though this may seem counter-intuitive, the reason is straightforward: the fire-behavior theory being used to guide vegetation treatments is incomplete because it does not sufficiently consider atmospheric motions, neither those induced by the fire, nor those induced by the vegetation treatments being analyzed. Until operational fire models are updated to address these deficiencies by including the latest available science, claims of improved long-term landscape resilience remain unproven, and the known harm being done to the Pacific fisher is therefore not justified.

21. Unfortunately, appropriate caution when interpreting operational model results is not apparent when long-term improvements are asserted by the Services. For example, in its June 12 addendum to its 2020 Programmatic Biological Opinion (2020 PBO), the USFWS justifies anticipated negative impacts to the SSN DPS of the Pacific fisher, and its habitat, including its permitted Incidental Take of twelve individuals, by asserting planned vegetation treatments would "be beneficial for the fisher in the long-term by increased resilience of habitat" (2020 PBO addendum at 6). Similarly, in its February 23, 2021 Amendment to the Programmatic Biological Assessment (2020 PBA), the USFS makes similar claims, stating "Many of the management activities analyzed here and in the May 19, 2020 PBA are designed to reduce fuels and the risk of high-severity fires within the SSNDPS. Management activities that reduce the risk of high-severity

fire confer a long-term benefit to the SSNDPS resilience to fire ….” (2020 PBA Amendment at 5-6, February 23, 2021). Similar claims are repeated throughout the project documents associated with the 45 vegetation-treatment projects approved by USFWS.

Conclusion

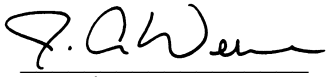
22. Recent high-resolution numerical fire simulations demonstrate important deficiencies in the current USFS fire-behavior theory being used to analyze and design vegetation treatments that are known by USFS and USFWS to be harming Pacific fisher habitat. By omitting atmospheric dynamics and wind-drag effects associated with vegetation treatments, fuels reductions designed to reduce fire intensity and fire spread are undoubtedly producing the opposite effect. Also, poorly designed ladder-fuel removal is likely increasing the incidence of crown-fire events that are killing our last large, old-growth trees.

23. Furthermore, the most comprehensive study to-date of forestland-fire data shows that more heavily managed forestland burns more severely, and the least-managed land (i.e., our National Parks and Wilderness Areas) are the most firesafe (correcting for forest type, topography, and climate variables).

24. Claims of long-term fire resilience are theoretical, and they are only as credible as the operational models being used to predict them. Assertions of long-term landscape resilience should be viewed with skepticism, and given the best-available science, including Atchley et al. 2021, Banerjee et al. 2020, Coen et al. 2018, and Bradley et al. 2016, are we willing to bet the Pacific fisher’s future on unproven assertions being made by the Services?

25. Given recent trends in California of ever-increasing fire size and severity, the desire to take decisive action to make things better is understandable. However, if our actions are ill-informed by flawed application of operational fire-behavior models that are guiding us to make an already dire situation worse, until we fully understand the consequences of the actions we take, no action is preferred.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and recollection. Executed on April 4, 2021 in Lafayette, Colorado.



Joseph Werne

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ATTACHMENT L

EXHIBIT A

Curriculum Vitae: JOSEPH WERNE
ATTACHMENT L

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Education:
Old Dominion University
B.S. (summa), Physics (1987)
B.S. (summa), Mech. Eng'g & Mechanics (1987)
The University of Chicago, Ph.D., Physics (1993)

Positions Held:

1985-87	Engineering Co-op, Reactor Plant Planning Yard, Newport News Shipbuilding
1987-89	Teaching Assistant, Physics Department, The University of Chicago
1989-92	Research Assistant, Department of Astronomy and Astrophysics, The University of Chicago
1992-94	Postdoctoral Fellow, Advanced Study Program, National Center for Atmospheric Research
1994-95	Visiting Scientist, National Center for Atmospheric Research
1995-96	Research Associate, Joint Institute for Laboratory Astrophysics & Laboratory for Atmospheric and Space Physics, Univ. of Colorado
1997-01	Research Scientist, NorthWest Research Associates
2001-08	Assistant Division Manager, NorthWest Research Associates
2006-18	Vice President, NorthWest Research Associates
1998-	Affiliated Faculty, Department of Applied Mathematics, Univ. of Colorado
2001-	Senior Research Scientist, NorthWest Research Associates
2003-	Director on the Board, NorthWest Research Associates

Professional Societies:
American Physical Society
American Astronomical Society

Professional Activities:
Presentations: Gordon Conference on Modeling in Solar Terrestrial Physics (1990); Gordon Conference on Solar Plasma and MHD Processes (1991); Army High Performance Computing Research Center, Workshop on Visualization and Statistical Analysis in Hard Turbulence (1992); The James Franck Institute, The University of Chicago, Turbulence Meeting (1993); Pittsburgh Supercomputing Center, Supercomputing Techniques: Parallel Processing/Cray T3D (1994); Woods Hole Oceanographic Institution Summer Program in Geophysical Fluid Dynamics (1995); NCAR Geophysical and Astrophysical Convection (1995); American Physical Society 43th, 44th, 46th, 47th, 48th, 58th, 60th & 66th Annual Meetings of the Division of Fluid Dynamics (1990-91, 1993-95, 2005, 2007, 2013); University of California 12th Annual Conference in Nonlinear Science (1996); National Center for Supercomputing Applications, Parallel Computing Workshop; SGI Origin (1997); DoD HPCMO User Group Conference (1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011); Global Grid Forum 2 and 3, Washington, D.C. (2001) and Frascati, Italy (2001); EUROMECH Workshop 428 "Transport by coherent structures in environmental and geophysical flows," Torino, Italy (2001); Department of Energy, Environmental Meterology Program, "Vertical Transport and Mixing," Salt Lake City (2001, 2002); Center for Turbulence Research, "30 Years of Dynamic Modeling," Stanford University (2002); Invited Speaker, Center for Nonlinear Studies, Los Alamos National Laboratory (2003); Invited Speaker, "Helio- and Asteroseismology: Towards a Golden Future," Yale University, New Haven, Connecticut (2004); "Turbulence and Waves," Lighthill Institute of Mathematical Sciences, London, UK (2004); Visiting Scientist Colloquium, NASA Langley Research Center (2005); Invited Speaker, "Turbulent Mixing and Beyond," Trieste, Italy (2007); Co-organizer, NCAR 2008 Theme of the Year Workshop "Petascale Computing: Its Impact on Geophysical Modeling and Simulation" (2008). Invited Speaker, 20th DoD HPCMO User Group Conference, Schaumburg, IL (2010); Invited Speaker, "Turbulent Mixing and Beyond TMB-2011," Trieste, Italy (2011); Invited Speaker, Fundamental Aspects of Geophysical Turbulence II (2015); VIII International Symposium on Stratified Flows (2016); Invited Speaker, "McWilliams Symposium" National Center for Atmospheric Research, Boulder, CO (2016).

Software: Principle Architect & Author, *Practical Supercomputing Toolkit*, used by the Department of Defense (DoD) High Performance Computing and Modernization Program (HPCMP) to define a uniform command-line interface that streamlines use of disparate supercomputer platforms, high-speed networks, and archival data storage systems at all of the DoD HPC centers: https://pstoolkit.nwra.com. Principle Architect & Author, *Werne-NWRA Triple Code*, a highly accurate pseudo-spectral fluid-dynamics solver designed to run efficiently on modern massively parallel supercomputer platforms: https://cora.nwra.com/~werne/triple/.

Teaching: Instructor, Summer MCAT Program, The University of Chicago, Biological Sciences Division and the Pritzker School of Medicine (1989-92). Principal Lecturer, NCAR 2008 Summer School: Geophysical Turbulence. Instructor, University of Colorado at Boulder 2009 Supercomputing Workshop, Fluid Instabilities, Waves, and Turbulence, as part of Professor Juri Toomre's ASTR/ATOC 5410 Graduate Course

Awards: A.D. Morgan Scholarship (1986-87); Faculty Award in Mechanical Engineering and Mechanics (1987); Outstanding Senior Award in Physics (1987); Gregor Wentzel Prize for Excellence as Graduate Student Tutor (1988).

Societies: Phi Kappa Phi; Pi Tau Sigma; Tau Beta Pi.

General Fields of Investigation:
Theoretical and numerical turbulence process, dynamics, and transport mechanisms in geophysical and astrophysical applications, including both stable and unstable stratification. Specific research areas include high-Rayleigh-number convection, penetrative convection, rotating convection, stratified sheer turbulence, gravity-wave breaking, wave-wave interactions, multi-scale shear and wave dynamics, magnetohydrodynamic instability and turbulence processes, and optimal-perturbation theory. Applications have included ocean- and atmosphere-dynamics modeling, aircraft-wakes evolution and ground interactions, plasma dynamics for space-weather applications, solar-interior modeling, helioseismic analysis of the solar interior, and Bayesian-hierarchical turbulence-process modeling in the troposphere and stratosphere. A primary emphasis has been on efficient and accurate spectral numerical methods, large-scale and high-performance computing, and massively parallel computing on a wide range of architectures, starting with the Cray XMP and YMP vector machines, the modestly parallel Cray C90, and then larger-scale and massively parallel platforms, including the Cray T3D, T3E, XT3, XT4, XT5, XE6, XC40; IBM SP, P4+, P5+, P6; SGI O2k, O3k, Altix; Compaq SC40/45.

Business Development:
Developed, analyzed, and helped implement the 2000 NWRA Business Model, which encourages Research Scientists to become Principal-Investigator (PI) Partners in a successful research-science company. This model is novel, maximizes PI compensation, minimizes corporate taxes, has proven to be an invaluable recruiting tool for NWRA, and has worked successfully since 2000.

Publications:

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ATTACHMENT L

EXHIBIT B

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Binkley, D., T. Sisk, C. Chambers, J. Springer, and W. Block. 2007. The role of old-growth forests in frequent-fire landscapes. *Ecology and Society* **12**(2): 18. [online] URL: http://www.ecologyandsociety.org/vol12/iss2/art18/
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Synthesis, part of a Special Feature on The Conservation and Restoration of Old Growth in Frequent-fire Forests of the American West

The Role of Old-growth Forests in Frequent-fire Landscapes

Daniel Binkley [1], *Tom Sisk* [2,3], *Carol Chambers* [4], *Judy Springer* [5], *and William Block* [6]

ABSTRACT. Classic ecological concepts and forestry language regarding old growth are not well suited to frequent-fire landscapes. In frequent-fire, old-growth landscapes, there is a symbiotic relationship between the trees, the understory graminoids, and fire that results in a healthy ecosystem. Patches of old growth interspersed with younger growth and open, grassy areas provide a wide variety of habitats for animals, and have a higher level of biodiversity. Fire suppression is detrimental to these forests, and eventually destroys all old growth. The reintroduction of fire into degraded frequent-fire, old-growth forests, accompanied by appropriate thinning, can restore a balance to these ecosystems. Several areas require further research and study: 1) the ability of the understory to respond to restoration treatments, 2) the rate of ecosystem recovery following wildfires whose level of severity is beyond the historic or natural range of variation, 3) the effects of climate change, and 4) the role of the microbial community. In addition, it is important to recognize that much of our knowledge about these old-growth systems comes from a few frequent-fire forest types.

Key Words: *ecological processes; evolutionary adaptations; historic range of variation (HRV); human values; knowledge gaps; resilience; understory vegetation*

INTRODUCTION

Traditional forestry took decades to understand the unique features of frequent-fire forests. Early foresters in the Southwest were very concerned about the near-absence of young trees in forests dominated by older, widely spaced ponderosa pine (*Pinus ponderosa*) trees, and they realized that frequent fires prevented the development of closed-canopy, high-wood-producing forests. A young Aldo Leopold (1920) wrote:

> *...the prevention of light burning during the past 10 years... has brought in growth on large areas where reproduction was hitherto largely lacking. Actual counts show that the 1919 seedling crop runs as high as 100 000 per acre. It does not require any very elaborate argument to show that these tiny trees, averaging only 2 inches high, would be completely destroyed by even a light ground fire.*

Leopold did not yet have the insight to understand the profound consequences of 100 000 seedlings per acre, although he later came to see the more subtle argument that fire prevention thwarted the processes necessary for the long-term health of the forest ecosystem.

Frequent fires challenge the survival of new tree seedlings and strongly shape the long-term development of all the components of a forest. Young trees often establish in clumps, as a legacy of patchy fuels and fire behavior; and this structural legacy may last for centuries. Gaps between clumps may result from a combination of competition with grasses and shrubs, from uneven distribution of seeds, and also the pattern of fire that interacts with the pattern of soils, vegetation, and fine fuels. The intimate mixture of shady clumps of trees and small open meadows provides a local-scale diversity that would be found only at much larger scales in landscapes without frequent fire. Indeed, some classic vocabulary in forestry is not well suited for frequent-fire forests. As noted by Kaufmann et al.

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in this issue, old-growth characteristics in dry, frequent-fire forests are remarkably different from the old-growth images developed in wetter areas. Even the concept of the forest "stand" as a part of a forest landscape with relatively uniform conditions and somewhat distinct boundaries may not be suitable for frequent-fire forests (Long and Smith 2000). The important details about the spatial arrangement of trees in the landscape relate to the clumping of trees into small groups, and to clusters of these groups, rather than to extensive, uniform areas of similar-size trees stretching across hundreds or thousands of hectares (Fig. 1).

The frequent recurrence of fires reinforces a spatial heterogeneity, promoting a forest with high, small-scale variety in plant species composition, animal habitat, and ecological processes. This pattern of local variety is a key defining feature of old-growth forests in frequent-fire landscapes. In this chapter, we consider some of the crucial ecological roles that might depend partially on the spatial arrangements of trees, and those that relate to the fully developed old-growth conditions.

EVOLUTIONARY ADAPTATIONS TO FIRE

The adaptations of large trees to surviving fire are fundamental in the ecology of old-growth forests in frequent-fire landscapes. Depending on the species, trees in these forests have developed a number of characteristics to withstand and survive fire. Although fire typically kills small conifers with thin bark by overheating or destroying the cambium layer (van Mantgem and Schwartz 2003), most coniferous tree species in the mature state have thick, insulating bark that is relatively nonflammable, long needles, self-pruning lower branches, and deep roots. Giant sequoia (*Sequoiadendron giganteum*) also experiences rapid growth that raises canopies off the ground quickly, as well as latent buds and serotinous cones (Stephenson 1999). Jeffrey pine (*Pinus jeffreyi*) develops buds with thick scales that help withstand heat. Sugar pine (*Pinus lambertiana*) has thick, fire-resistant bark and an open canopy that retards the spread of fire through the canopy. Gray pine (*Pinus sabiniana*) has thick bark and is self pruning. Arizona pine (*Pinus arizonica*) has insulated buds, a high capacity to recover from crown scorch and an open crown. Ponderosa pine has thick bud scales; tight needle bunches that enclose and protect the meristems, then open into a loose arrangement that does not favor combustion or propagation of flames; high foliar moisture; and a deep rooting habit. The foliage and buds are also usually elevated away from the flame zone. With its high foliar moisture content, ponderosa pine can withstand extensive scorching as long as the buds and twigs, which tolerate higher temperatures than needles, are not badly scorched.

USING PAST CONDITIONS AS A GUIDE

Historic range of variability (HRV) or natural range of variability are interchangeable terms along with natural variability, historical variation, and natural range of variability. These terms suggest that past conditions and processes can be used as guidance for managing present-day ecosystems, and that disturbance (and resultant variety) is a vital attribute of nearly every ecosystem (Landres et al. 1999). The HRV approach is just a first step in pondering possible future forests and landscapes, because it is difficult to deduce details about HRV (especially across large areas and long times), and because future climate conditions may not track historical trends. Because of changes in fire regimes, particularly caused by grazing and fire suppression, many frequent-fire forests now function well outside the HRV (see Moore et al. 1999, Veblen et al. 2000, Allen et al. 2002, Arno and Fiedler 2005, Zier and Baker 2006). For example, Sierra Nevada forests currently are undergoing fire-free periods that are much longer than at any time in the past two centuries (Keeley and Stephenson 2000).

Determining the Historic Structure and Function of Old-growth Forests

Almost all of the frequent-fire landscapes of the western United States have changed dramatically as a result of livestock grazing, timber harvesting, and fire suppression. Given the near absence of fully functioning, old-growth forests in frequent-fire landscapes, scientists have to use a variety of approaches to determine the structure and processes that characterize these forests (Swetnam et al. 1999, Egan and Howell 2001, Friederici 2003). Historical journals, photographs, and records provide information from some forests on the number and sizes of trees before major changes in land use, and the most detailed records even provide information on other features, such as downed logs and bunchgrass locations (Moore et al. 2004). In the absence of historical records, detailed characterizations

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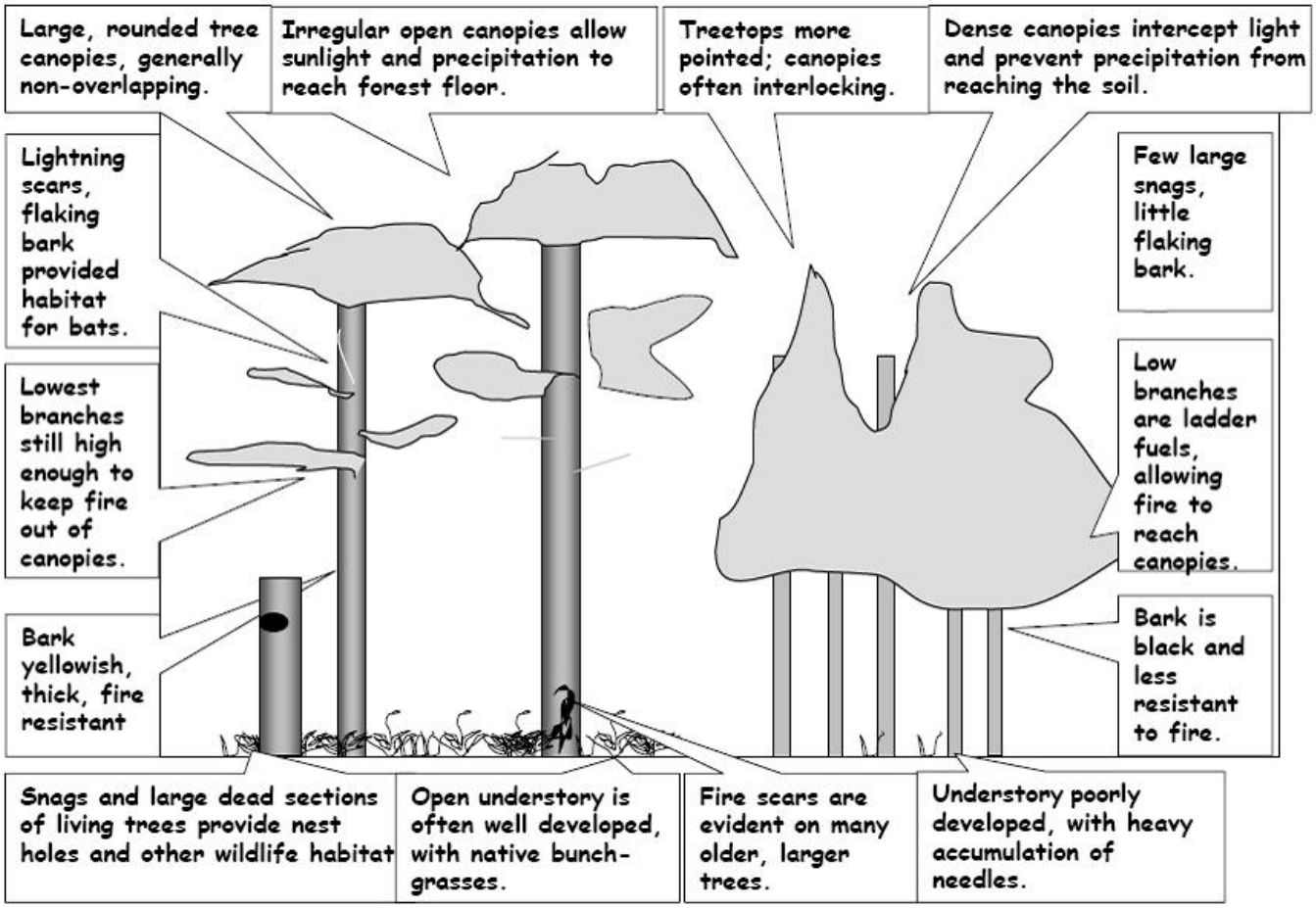
Fig. 1. A cartoon description of the key features of old-growth forests in frequent-fire landscapes (left), in contrast to younger forests lacking fire (right).



of tree ages, stump ages, and other field evidence can provide solid descriptions of previous conditions. A very few sites, such as the Powell Plateau in the Grand Canyon and some regions of northern Mexico, may have experienced so little change in land use and fire regimes that contemporary measurements are possible (Fulé et al. 2005). Some of the most detailed insights about the structure and function of old-growth forests come from intensive experiments that have reestablished historic forest structure. These treatments include harvesting (and removing) the excessive young trees, retaining most old trees, and reintroducing fire at intervals that match the frequency of historical fires (Bailey and Covington 2002, Fulé et al. 2002, 2006). Forest restoration treatments may not redevelop historical old-growth conditions perfectly for a variety of reasons: 1) the seedbanks of native species may be depleted after decades without fire, 2) exotic species may invade, and 3) the animal communities may not be the same as in past centuries.

We know that historic frequent-fire, old-growth forests were not all alike. For example, Moore and her colleagues (2004), after studying a set of 11 research plots established in the early 1900s in Arizona and New Mexico, found that basal area ranged from 9 to 27 m^2/ha, with an average of 15 m^2/ha. By the end of the century, basal area had doubled on average, although some sites had changed little and others had tripled. Similarly,

Arno et al. (1995), using dendrochronological reconstructions of six old-growth ponderosa–Douglas-fir (*Pseudotsuga menziesii*) stands in Montana, found basal densities in 1900 ranging from 15 to 35 m^2/ha. The variety of old-growth forest structures probably varied with environmental factors that influence tree establishment, growth, and mortality, including the interacting effects of fires. We also know that the return intervals for fires were longer for most of the ponderosa pine forests in eastern Montana (Morgan et al. 2002) and the Front Range of Colorado—and modestly longer for forests in western Montana (Arno 1980), eastern Oregon (Youngblood et al. 2004), and eastern Washington (Everett et al. 2000)—than for similar forests in Arizona and New Mexico. However, we don't know how this difference in fire regime led to differences in stand structure and function (for example, see Kaufmann et al. 2006)

PROCESSES

The most essential process in the development of old-growth conditions is time. Frequent-fire forests occur under relatively dry conditions, and the lack of abundant water limits the growth rates of trees. Forests with slow-growing trees take 100–200 years to begin to show the full spectrum of old-growth structure and processes.

However, time alone is not sufficient to encourage old growth in frequent-fire forests. Fundamental to the development of old-growth conditions is the interaction of forest processes with repeated fires. In the absence of repeated fire, tree density tends to remain high, and the fuel structure develops to the point where a very intense fire kills most of the trees. As a result, old-growth conditions are never reached.

Frequent surface fires allow larger trees to persist, limit the success of new trees, and foster the spatial pattern of open meadows mixed with tree clumps. Surface fires that recur every few years or decades kill most of the small trees that managed to establish during years with favorable precipitation and seed crops. The trees that survive the fires experience less competition for light and soil moisture, leading to higher rates of individual growth, thicker bark, and higher canopy base heights—all of which makes these trees more resistant to subsequent surface fires. The grasses, forbs, and shrubs that thrive between clumps of trees are typically burned by surface fires, but these plants often resprout from surviving roots or reseed.

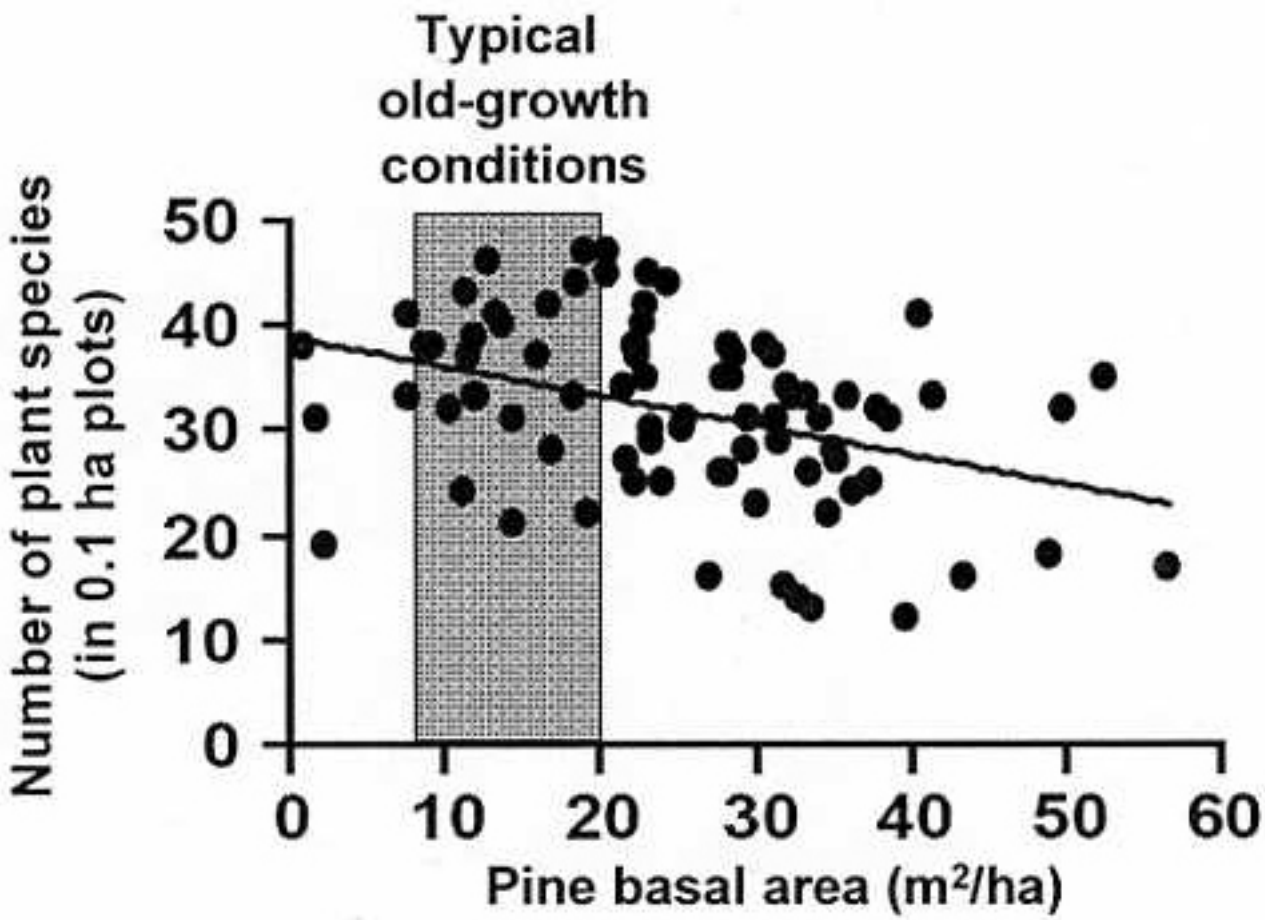
Without the recurring cultivation of the forest by fire, old-growth conditions may not develop. Fire suppression allows tree seedlings to recruit in large numbers, forming denser stands. Wildfire spreads more easily into the canopies of smaller trees with low branches, and from smaller trees into the crowns of previously fire-resistant old trees. With abundant small trees established among the more scattered old growth, fire may spread rapidly across large areas, with high mortality in all age and size classes.

Productivity, Hydrology, and Nutrient Cycling

One of the most distinctive features of frequent-fire, old-growth forests is the major contribution that the understory vegetation (grasses, forbs, shrubs) makes to ecosystem diversity and productivity. In the absence of fire, the density of overstory trees increases, which reduces the diversity of understory vegetation 10–30% (Fig. 2, Laughlin and Grace 2006). This relationship between the density of trees and understory diversity is further influenced by the number of years between fires (the fire return interval). For example, a ponderosa pine forest on the Kaibab Plateau that burned in the past 10 years might have 35 species in the understory, compared with 28 species after 70 years without a fire, and 22 species after 120 years without a fire (Laughlin et al. 2005).

Restoration treatments reduce tree density and lower the total growth of trees in a forest, but increase the growth of residual (retained) trees and the biomass and productivity of the understory. In Montana, understory plant diversity declined the first year after a thinning and burning restoration treatment in a ponderosa pine–Douglas-fir forest, but increased significantly 2 years after treatment (Metlen and Fiedler 2006). Experiments around northern Arizona typically show understory biomass and growth increases of more than two-fold in response to thinning and prescribed burning (Fig. 3; Abella 2004, Gildar et al. 2004, Moore et al. 2004). Restoration treatments appear to have little effect on the total productivity of the forests, but they shift how the growth is allocated between the overstory and understory. A restoration experiment at Fort Valley near Flagstaff, Arizona showed that total production did not change, but the proportion accounted for by the understory rose from 10% to

Fig. 2. The richness of understory plant species declines with increasing density of overstory pine trees, on the Kaibab Plateau in northern Arizona (after Laughlin and Grace 2006). Typical historic conditions would have had about 35 species per 0.1-ha plot, but with changing land use and fire regimes, the most common species richness has declined to 25 to 30 species per 0.1-ha plot.



about 25%. The benefit of restoration treatments also differs among plant types. For example, the restoration responses at Fort Valley were greater for grasses than forbs (Moore et al. 2006), greater for leguminous forbs than other types, and greater for C_3 grasses (e.g., bottlebrush squirreltail (*Elymus elymoides* subsp. *elymoides*)) than C_4 grasses (e.g., mountain muhly (*Muhlenbergia montana*)). All of these trends might differ in response to major or minor differences in restoration prescriptions, site history, and current weather.

The higher productivity of understory plants in old-growth (and restored) forests in frequent-fire landscapes results in part from the low canopy leaf area of the overstory trees. Tree canopies cover less than half of the ground area (and commonly as little as 25%). Despite this patchy distribution of trees, the total amount of leaves in the tree canopy on 1 ha would still provide 2 or 3 ha of leaf surface area to intercept light. Forests in landscapes with higher supplies of water commonly have canopy surface areas of 4 to 6 ha displayed for each hectare of ground area.

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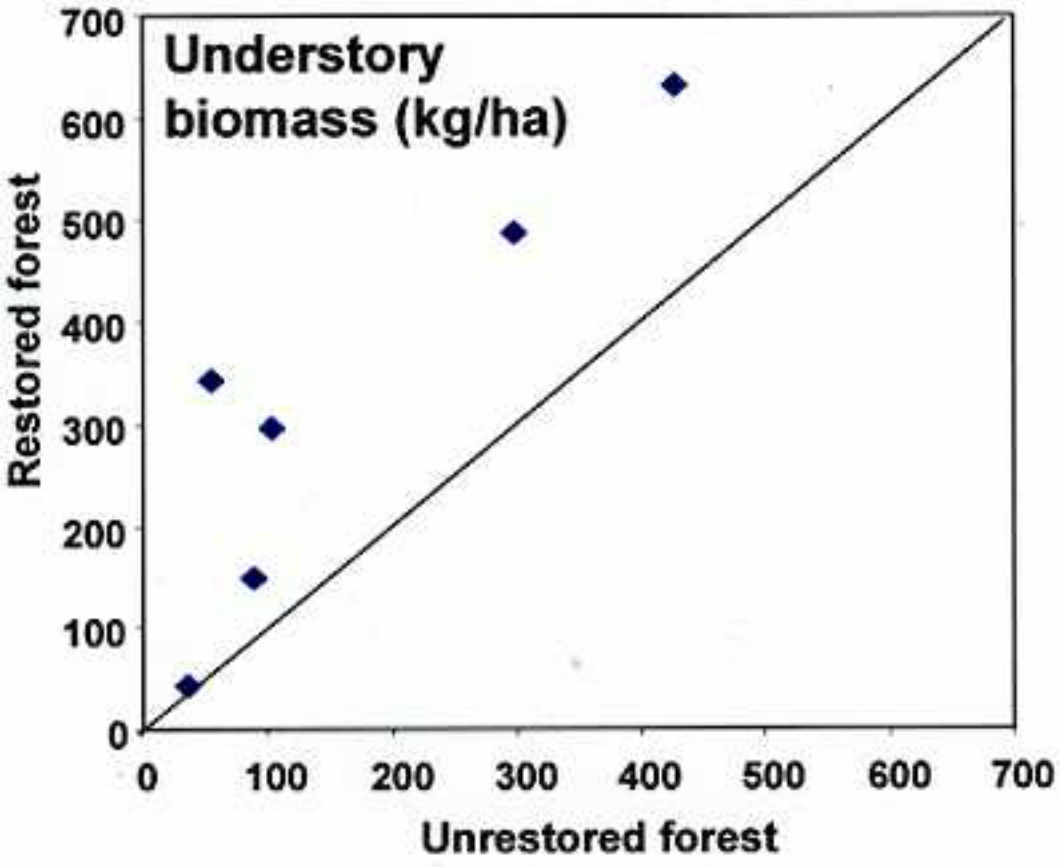
Fig. 3. Understory biomass and growth were much higher in forests with restoration treatments than in control forests (from summary of Abella 2004, Gildar et al. 2004, Moore et al. 2006). The greatest proportional increases occur when the biomass in the unrestored forests is particularly low.



The amount of tree leaf area in a forest may have important effects on the supply of water in the soil that is available for both trees and understory vegetation. Precipitation falling on tree canopies may be intercepted, accumulating briefly on the needles before evaporating back to the atmosphere, never reaching the soil. Forests with high leaf area not only lose more precipitation from this interception loss, but they also have higher rates of water use by trees, with lower amounts of soil water available for use by understory plants. In wetter landscapes, changes in the amount of tree leaf area influence the amount of water reaching streams. For example, reducing tree cover in higher-elevation forests in the Rocky Mountains commonly increases stream flow by 15 to 30% (MacDonald and Stednick 2003). The amount of water flowing in streams in frequent-fire landscapes depends less on the density and size of trees (and canopies) than in wetter areas, because drier conditions mean that water not used by trees will be used by understory plants. Restoring old-growth structure to forests in frequent-fire landscapes may lead to increased streamflow during wet periods and, perhaps, to some recharge of subsurface aquifers.

Forest restoration treatments generally improve the water status of large trees, reducing water stress, and increasing the volume of resin in stems (Wallin et al. 2004, Zausen et al. 2005). Improved water

status may enhance the overall vigor of trees, leading to lower rates of mortality from bark beetles and other insects and diseases.

Nutrient cycles in forests are influenced directly by fire, including losses (such as nitrogen converted to gas as biomass is consumed) and probably short-term increases in availability of some nutrients (including nitrogen). In the longer run, differences between old-growth and non-old-growth conditions may derive from the indirect effects of changes in vegetation composition than from the direct, cumulative effects of fires (Hart et al. 2005a).

EVOLUTION AND ADAPTATION

The biotic processes in forests develop from interactions between genes, organisms, and environmental factors. The genetics of a forest include those of trees, understory plants, wildlife, and the unimaginably diverse organisms in the soil. Although the interactions among genes, organisms, and environmental factors in a ponderosa pine forest are beyond the scope of this article (and indeed, beyond human comprehension!), we provide a few examples to illustrate the complexity and resilience of this system.

Bark Beetles

Bark beetles are an important, natural component of many conifer ecosystems. Bark beetles (and their fungal symbionts) routinely kill small numbers of pine trees and, occasionally, extremely high beetle populations lead to massive pine mortality across very large areas. A number of factors—drought, lightning strikes, root pathogens, large fire scars, severe defoliation, tree senescence, excessive competition—make an individual old tree or stand more susceptible to bark beetle outbreaks. Recent thinning may also contribute to increased wind turbulence in a stand, leading to root damage and, perhaps, making individual trees susceptible to attack (Christiansen et al. 1987).

Coniferous trees have developed two main mechanisms to counter beetle attacks. First, they have a system of resin ducts in the phloem and xylem that can pitch-out invading beetles. Second, they have developed a hypersensitive reaction to invasion by microorganisms (including fungi, bacteria, and viruses) that enter the tree along with the beetles. A necrotic area, impregnated with resinous and phenolic compounds that prevent beetle gallery construction and fungal proliferation, then forms around the point of infection. This wound resin is highly toxic to beetle eggs and larvae and also inhibits fungal growth (Christiansen et al. 1987).

The ability of a large, old tree to resist an attack depends on its genetic makeup and physiological status (Franceschi et al. 2005). Independent of age, ponderosa pine trees grow slowly when stressed by competition. However, because most old trees are large in size and stature, they may have higher maintenance respiration demands because of the amount of living, non-photosynthetic tissue they maintain compared with younger trees (Skov et al. 2004). Another factor that may limit photosynthetic rate is that these large trees also tend to have more branch junctions and a longer root-leaf hydraulic path length that may decrease hydraulic conductance (Skov et al. 2004). Together, these factors may all contribute to slow growth of old ponderosa pine trees.

Bark beetles are only one of many potential threats to ponderosa pine trees, and the susceptibility to each threat differs among trees. For example, ponderosa pine trees may be attacked by bark beetles and infected by dwarf mistletoe (*Arceuthobium* spp.), but the success of each of these varies among individual ponderosa pines (Fig. 4). Trees that appear susceptible to beetles appear to be resistant to dwarf mistletoe, and vice versa. The continued survival, growth, and seed production of individual pine trees may depend in part on the local prevalence of parasites, which depends in turn on the local genotypes of pines and local environmental conditions.

Abert's Squirrels

Abert's squirrels (*Sciurus aberti*) are also highly dependent on ponderosa pine trees. Ponderosa pines provide them with places to live, nest, rest, and hide from predators as well as food in the form of bark, buds, flowers, and seeds (Hoffmeister 1986). Squirrels choose individual trees based on the (heritable) chemistry of tree phloem. As a result, different populations of Abert's squirrels are adapted to different populations of ponderosa pine (Snyder 1992, 1993; Snyder and Linhart 1994).

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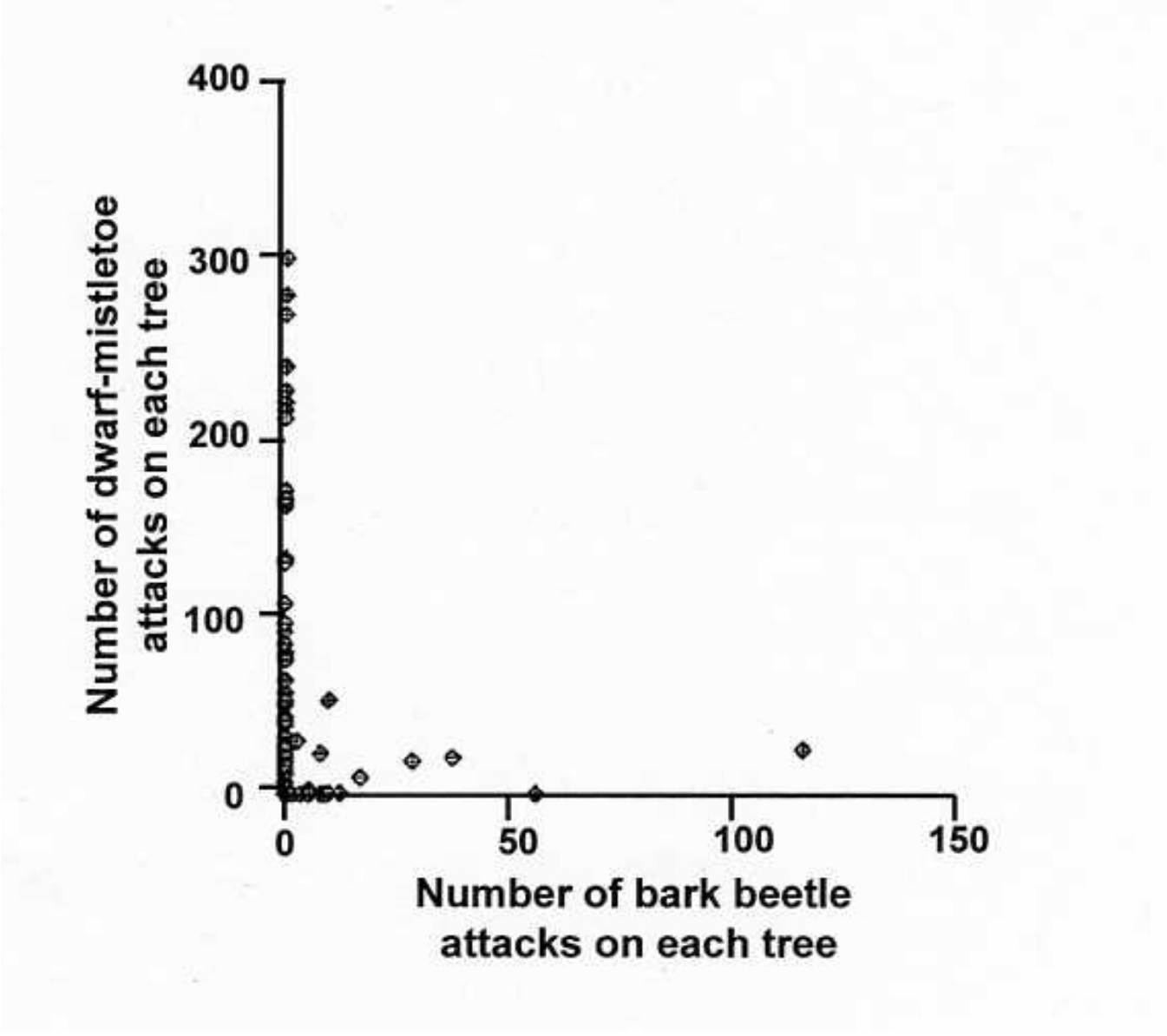
Fig. 4. Some ponderosa pine trees were heavily attacked by bark beetles, some heavily infected by dwarf mistletoe parasites, and some were unaffected—but no trees were heavily attacked by both bark beetles and dwarf mistletoe (after Linhart et al. 1994).



Yet another ecological interaction connects ponderosa pines and Abert's squirrels. Squirrels eat mycorrhizal fungi and help disperse it through their fecal pellets. Mycorrhizal fungi are very important to plant productivity, so if the fungi were rare, then squirrels could, perhaps, enhance forest productivity (Vireday 1982, Kotter and Farentinos 1984a, b). Mooney and Linhart (2006) have recently developed an even more interwoven story about pines, growth, birds, ants, spiders, aphids, wasps, and dwarf mistletoe.

Genetics and Old Trees

The genotypes of pine trees are influenced by both selective pressures (Abert's squirrels, beetles, and dwarf mistletoes), and by the flow of genes in the neighborhood. The genes of paternal trees flood the local landscape as pollen drifts on the wind, but maternal genes disperse only as far as seeds can fall from a tree or be carried by animals (Latta et al. 1998). Old trees may be particularly important in a forest, as they have (by definition) survived centuries of changing environmental and biotic challenges. The presence of these trees in a landscape is critical for contributing both seeds and pollen to later generations of trees.

Resilience and Fire at the Landscape Scale

Just as individual trees have mechanisms that make them resistant to bark beetles and fire, a healthy, functioning forest will exhibit resilience on a large scale. Persistence, resilience, and resistance are all terms applied to the stability of an ecosystem (Holling 1973, Gunderson et al. 1995, Gunderson and Holling 2002). Ecosystem fragility is the opposite of stability and is expediently defined as "...the degree of change in species abundances and in species composition, following disturbance" (Nilsson and Grelsson 1995). Frequent-fire forests are highly stable in the long term, as long as fire is maintained in the system. However, they may be considered fragile in the short term following a fire. Moreover, many of these forests are now considered fragile in the long term, particularly following the catastrophic fires that result from long periods of fire suppression.

OLD-GROWTH FOREST COMPOSITION

Although processes are the driving forces behind any ecosystem, those processes are reflected and supported by the composition of the ecosystem, that is by the living and non-living entities that exist in the ecosystem. Old-growth forests, by definition, have old trees, but the presence of old trees is just the beginning of a description of the composition of an old-growth forest. The frequent return of fires provides the opportunity for a great range of plants, animals, and microbes to coexist in the same landscape.

Plant Composition and Structure

In frequent-fire landscapes, the diversity of plant species in the forest understory is much greater than the diversity of overstory species. Moreover, frequent fires strongly influence the composition of understory plant communities. The most striking feature of old-growth patches of ponderosa pine may be the towering "yellow-bellies"—the large-diameter giants with the yellowish, fire-resistant bark. However, these forests are characterized as much by the understory that develops in the diverse range of habitat conditions: near clumps of big trees, in small openings between clumps, and in the open meadows between groups of large trees. Native perennial graminoids, including several species of fescue (*Festuca* spp.) and sedges (*Carex* spp.), dropseed (*Blepharoneuron tricholepsis*, *Sporobolus* spp.), Indian ricegrass (*Oryzopsis* spp.), and galleta (*Pleuraphis* spp.), as well as grazing-tolerant squirreltail and western wheatgrass (*Pascopyrum smithii*) and the ubiquitous grama grasses (*Bouteloua* spp.), form diverse understory communities that account for a large portion (more than half) of the net annual primary production in many old-growth ponderosa pine stands (Moore et al. 2004).

In addition to the native grasses, many annual and perennial forbs occur, usually as subdominants or rare components of the understory plant community. Native penstemon (*Penstemon* spp.), evening primrose (*Oenothera* spp.), and low-growing sages (*Artemesia* spp.) are complemented by diverse composites that flower throughout the growing season. Fire-resilient or -adapted shrubs, such as kinnikinnick (*Arctostaphylos uva-ursi*) and serviceberry (*Amelanchier* spp.) in the Inland Northwest, and cliffrose (*Purshia* spp.) and ceanothus in the Southwest, are characteristic of open-growing, old-growth pine forests. In many Southwest locations, Gambel oak (*Quercus gambelii*), which can be found from a low-growing shrub to subdominant tree, is the second most abundant woody plant.

This heterogeneity in species composition and structural types is characteristic of most types of old-growth forests that develop in frequent-fire landscapes. Large overstory trees typically occur in scattered clumps of several to several dozen individuals sometimes in a dense matrix of younger trees, and other times intermixed with grassland openings of several acres. In terms of species

composition, structural diversity, and ecological function, such old-growth forests contrast sharply with the dense stands that commonly develop when fires are suppressed. For example, Gambel oak and ceanothus are common shrubs in most Southwest ponderosa pine forests, but they typically are more common, and individual plants are larger and more developed, in open forests dominated by large pines. This diversity in the woody plant community has far-reaching implications, in part because these species support insect communities that are more diverse and abundant than those found in pure stands of ponderosa pine. Insect abundance, in turn, influences bird and bat populations, pollination rates, and the amount of wildlife forage. In this way, the composition and structural attributes of the ponderosa pine trees set the template for a potentially diverse plant community whose composition and function vary widely.

Animal Communities

Wildlife species respond in a host of ways to the structure of forests, and to boundaries between forests with different structures. Old-growth forests provide habitat for many wildlife species, but the critical habitat characteristics vary tremendously among species in both time and space. Some species are year-round residents, and others use old-growth forests only for breeding, wintering, or migration. Similarly, some species (e.g., pygmy nuthatch (*Sitta pygmaea*)) rely on specific old-growth structural components, such as large trees, whereas others (e.g., Abert's squirrel) need the structure of a whole patch of old-growth trees to facilitate their movements and provide food. Some species (e.g., northern goshawk (*Accipiter gentilis*)) require old-growth forest conditions within an entire landscape matrix that contains non-old-growth forests to meet all their ecological needs.

Starting at the small end of the scale, standing dead trees (snags) and partially dead trees (living snags) are an important part of a living forest ecosystem (Waskiewicz 2003, Chambers and Mast 2005). Dozens of species of birds and bats rely on living and dead trees for habitat, and many of these species in turn may influence the success (or failure) of other organisms (e.g., defoliating caterpillars). Resource managers are commonly required to provide a minimum number of snags, but more recent insights have indicated snags alone may not be the key to providing habitat for species such as bats, nuthatches, and bluebirds because the longevity and number of dead snags is limited in frequent-fire forest. For instance, Saab et al. (2006) tested prescribed fire on more than 130 plots in the southwestern United States, and found an average loss of 35% of the downed wood and half of the standing snags (Saab et al. 2006). Boucher et al. (2000) pointed out that snags may not last long in frequent-fire forests because surface fires either ignite snags or topple them by burning the roots. The best long-term habitat may be provided by living snags, which are live trees with large dead limbs or tops. These living snags often develop after lightning strikes, beetle infestations, pathogen attack, or a combination of these factors.

Moving up to the scale of patches or stands, forest structure influences survival and population persistence of a variety of wildlife species. Very uniform spacing of trees, which is the typical result of traditional silvicultural thinning treatments, degrades habitats for Abert's squirrels (Dodd et al. 2003). Information on characteristics and sizes of patches needed by the squirrel and the spatial arrangement of these patches are necessary parts of silvicultural prescriptions that ensure viable populations of these squirrels. Similar silvicultural and management decisions are required for other old-growth-dependent species, including spotted owls (*Strix occidentalis*).

At the scale of entire landscapes, old-growth forests will likely be part of a landscape mosaic that includes forests that lack old-growth characteristics. These non-old-growth habitats (ranging from meadows to dense young stands to maturing second-growth stands) might support some aspect of an animal species' needs. For example, northern goshawks are habitat generalists and their populations are often limited by the availability of food, which causes them to move between different habitat types. Reynolds et al. (1992) developed a landscape model of goshawk habitat that identifies a landscape-scale mosaic of six vegetation structural stages, which provide habitat for a suite of northern goshawk prey species. These vegetation structural stages range from grass-forb regeneration conditions to old-growth forest. Although northern goshawks need old-growth forests, particularly for nesting, they also benefit from a diverse mosaic across the landscape.

There are also symbiotic, co-evoluntionary relationships that animals have throughout old-

growth forests. As noted in the discussion above about Abert's squirrels, there is almost no limit to the nature of interactions in forests, and we are far from having a clear understanding of which interactions have major, cascading effects. Some wildlife species are considered keystone species in that other species depend on them to provide necessary conditions. For example, populations of hairy woodpeckers (*Picoides villosus*) increase after fire, just as populations of beetles increase (Covert-Bratland et al. 2006). In ponderosa pine forests in the Southwest, half of the species that nest in tree cavities cannot excavate cavities (secondary cavity-nesting species), so hairy woodpeckers may be critical in supporting a diversity of animals. The feedback cycle turns yet again because, without fires, the population of hairy woodpeckers may be low, reducing the habitat opportunities for other species, further changing the complex forest ecosystem.

Management activities that move a forest away from old-growth conditions change the opportunities for many species. For example, Szaro and Balda (1979) compared four treatments with an uncut control plot that had some characteristics of old-growth forests. Pygmy nuthatches, red-faced warblers (*Cardellina rubrifrons*), hermit thrushes (*Catharus guttatus*), cordilleran flycatchers (*Empidonax occidentalis*), and violet-green swallows (*Tachycineta thalassina*) lost habitat with treatments that moved the forests away from old-growth forest conditions.

Grazing alters herbaceous plant composition and structure, affecting habitat for species such as Mogollon voles (*Microtus mogollonensis*) (Chambers and Doucett 2008). Using a stable-isotope approach, these scientists found that herbivorous voles rely on grass and herbs for food, and that C_3 plants (e.g., yarrow (*Achillea millefolium*), lupine (*Lupinus* spp.), fescue, mulleins (*Verbascum* spp.), snakeweed (*Gutierrezia* spp.)) were a more important food source than C_4 plants (e.g., species of muhly (*Muhlenbergia* spp.) and grama grasses). Excessive ungulate grazing and introduction of invasive plant species that lead to changes in plant species composition or reductions in C_3 plants in montane grasslands and forests would reduce habitat quality for Mogollon voles. Mogollon voles are also important food for the threatened Mexican spotted owl (*Strix occidentalis lucida*) (Ward 2001). Recent research indicates that vole populations are reduced in pine–oak forests as the result of past logging and grazing practices (Block et al. 2005).

As noted throughout this special issue, the loss of old-growth structure in frequent-fire landscapes commonly leads to uncharacteristically severe wildfires, which, in turn, benefit some animal species and harm others. Bock and Block (2005), for instance, compared the bird communities in unburned and moderately and severely burned forests. Three years after the fires, the unburned forest had 31 species in the breeding season and 26 in the non-breeding season. Both levels of burn intensity increased the diversity of birds, with more than 40 species of breeding birds and 33 species of non-breeders. Species groups that increased in response to fire included woodpeckers, flycatchers, and thrushes.

Restoration treatments that move forests toward old-growth structure and composition appear to be effective in restoring bird habitat. Germaine and Germaine (2002) found that the fledgling rate (i.e., number of young to leave the nest) for western bluebirds (*Sialia mexicana*) in restored stands was 1.6 times greater than in dense, untreated stands. Converse et al. (2006a, b) evaluated effects of fuel-reduction treatments on small mammals and found that total biomass and population sizes of small mammals generally increased following thinning and fire. The most thorough assessments of post-restoration animal responses come from landscape-scale treatments near Mt. Trumball in the Grand Canyon–Parashant National Monument in northern Arizona (Covington et al. 2005). Various aspects of wildlife habitat and populations were examined for up to 9 years, and demonstrated that restoring old-growth forest structure generally favored species or had much lower negative effects than stand-replacing fire. Mule deer (*Odocoileus hemionus*) tended to use restored portions of the landscape at night, although they used restored and control areas about equally during the day. Abert's squirrel populations declined in response to the lower density of pine trees, but the squirrels did continue living in trees in the restored areas. Breeding pairs of northern goshawks were found in control and restored areas, and fledglings were successful in both forest types. The densities of butterflies doubled in restored areas.

Microbial Communities

Given that microbial interactions and processes are the foundation of much of the forest ecosystem, surprisingly little is known about the differences in

microbial communities between old-growth forests and post-fire-cessation forests. The two microbial communities that we know the most about are wood-decaying fungi and mycorrhizal fungi.

A number of wood-decaying fungi infect primarily old trees, roots, and large branches. Several species of wood-decaying fungi found in unmanaged older forests are rare in younger stands (Romme et al. 1992). Aging trees tend to become increasingly vulnerable to wood-decaying fungi because fungi can enter through dead branch stubs, knots, broken tops, fire scars, and wounds such as those caused by bark beetles or woodpeckers (Farris et al. 2004). In addition to the vital role these pathogens play in the carbon cycle and in recycling nutrients for plants, they also create valuable habitat for numerous wildlife species (Marcot 2002).

Mycorrhizal fungi form symbiotic associations with tree roots, providing water and nutrients to roots in exchange for sugar. Experiments by various researchers have shown that fire may substantially affect these fungal associations, particularly near the soil surface. For example, a study by Pattinson et al. (1999) that simulated the effect of fire showed a decline in numbers of mycorrhizal propagules and a reduction in the hyphal network (the tiny, networked strands of fungus). Korb et al. (2003) found a rapid increase in arbuscular mycorrhizae following restoration treatments in northern Arizona, whereas Smith et al. (2005) reported a short-term reduction in ectomycorrhizal fungi (EMF) following prescribed fire in Oregon.

Researchers have also studied the effects of seasonal burning on the mycorrhizal community. Smith et al. (2004) detected that fall burning in dry ponderosa pine stands significantly reduced duff depth, live root biomass, and EMF species richness compared with spring burning. The probability of mature tree mortality was also greater after fall burning. Meyer et al. (2005) found that burning reduced litter depth and log volume as well as the frequency, biomass, and species richness of mycorrhizal truffles in an area of the Sierra Nevada. The authors posit that decaying woody debris forms an important reservoir of moisture and nutrients, especially in dry forests, for fruiting fungi. It also appears that mycorrhizal fungi are more likely to survive when the duff layer is thin or moist.

Hart et al. (2005a) report that repeated burning (every 2 years during a 20-year period) reduced fine root length, fine root biomass, and mycorrhizal root biomass, as well as the amount of nitrogen and phosphorous stored in the belowground pools. The authors speculate that the change in these pools most likely occurred during the first few prescribed burns when the fuel loads and fire intensities would have been highest. Their results suggest that such frequent burning may have negative long-term effects on belowground biomass pools and nutrient cycling. They also postulate that these negative effects may be avoided by mechanically removing some of the accumulated fuel before prescribed burning.

Despite these descriptive studies and experiments, we essentially know very little about the critical changes that may (or may not) follow the loss of old-growth characteristics in a forest. A recent study (Hart et al. 2005b) found that a fire following a long, fire-free period reduced the diversity of the bacterial community by more than half, yet more than doubled the diversity of the fungal community. We do not know if these dramatic changes have important cascading effects in the forest.

HUMAN VALUES

Although this is covered in more depth by other authors in this special issue, we also want to say that old-growth forests in frequent-fire landscapes provide a host of human values that go beyond the list of species present, or economic and ecological functions. For instance, old-growth forests carry a legacy of information from earlier times. They can tell us a great deal about how climates have varied in past epochs, and how the forests (and fires) responded. Without the information held in tree rings, we would not know how the landscapes of the southwestern United States were influenced by patterns of El Niño/Southern Oscillation precipitation (Grissino-Mayer and Swetnam 2000) or to what degree the rise and fall of dryland civilizations related (or not) to climate (Dean 1988). We also recognize that many people see an inherent beauty in old-growth forests (Huckaby et al. 2003), and find personal sustenance from these "wilderness" or wild landscapes.

KNOWLEDGE GAPS

All forests are complicated ecosystems, making the potential list of gaps in our knowledge almost unbounded. Nevertheless, we can identify several key areas where studies and experiments are needed to fill major gaps that hinder restoration efforts of old growth in the frequent-fire forests of the American West.

Ability of Understory Vegetation to Respond to Restoration Treatments

How well can we recover the historical understory (and related animal habitat features) that characterized old-growth conditions? The absence of fire for a century has been coupled in many forests with a host of other land-use impacts, including intensive livestock grazing and logging. Long-term plots from northern Arizona have shown not only declines in total understory production and species diversity, but also shifts among vegetation types (such as greater losses of C_4 grasses than C_3 grasses). How well can the understory recover its former productivity and species composition in response to thinning or thinning plus fire? Does the season and/or frequency of burning have an effect on the understory? Will adding native seed from nearby areas be critical? How did use by Native Americans affect the understory of pre-European-settlement, old-growth forest understories? More experiments across a variety of landscape conditions are needed to answer these and other questions related to understory vegetation.

Ability of Frequent-fire Forests to Recover Following Catastrophic Wildfires

How does ecosystem recovery progress after severe wildfires that exceed the historical range of fire behavior in frequent-fire landscapes? We expect that recovery will be slow, but will recovery eventually occur or will the forests be converted to other vegetation types (grasslands or shrublands)? What restoration treatments would be most effective for recovering natural forest composition, structure, and function after large, severe fires? Which treatments can move forests toward old-growth conditions and also reduce risks of severe fires?

Ability to Extrapolate Knowledge of Certain Forests to Other Places and Forest Types

Much of our knowledge about old-growth conditions in frequent-fire landscapes comes from a very limited range of forest types, and detailed information comes from an even more restricted set of intensive study sites. How representative are the ponderosa pine landscapes of northern Arizona for ponderosa pine in other areas? How different are dry mixed-conifer forests from ponderosa pine forests, and how do they vary with landscape position locally and throughout the West? We have a good general understanding the key questions and the important processes, but restoration of old-growth conditions in any local forest will depend on locally appropriate details.

The Uncertainty of Climate Change and its Effects on Forested Ecosystems

Climates have changed dramatically in the past 10 000 years, and the 21st century will likely differ from the 19th century. What do we need to know to foster old-growth forest conditions under various climate scenarios? If managers can only afford to restore a portion of a landscape (which is almost always the case), should restoration focus on lower-elevation sites (with the risk that climate changes would shift the ecotone upward)? This knowledge gap will probably not be filled by data collection or experimentation, but the potential effects of climate change need to be kept in mind.

Responses to this article can be read online at:
http://www.ecologyandsociety.org/vol12/iss2/art18/responses/

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ATTACHMENT L

EXHIBIT C

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Mixed-severity wildfire and habitat of an old-forest obligate

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Abstract. The frequency, extent, and severity of wildfire strongly influence the structure and function of ecosystems. Mixed-severity fire regimes are the most complex and least understood fire regimes, and variability of fire severity can occur at fine spatial and temporal scales, depending on previous disturbance history, topography, fuel continuity, vegetation type, and weather. During high fire weather in 2013, a complex of mixed-severity wildfires burned across multiple ownerships within the Klamath-Siskiyou ecoregion of southwestern Oregon where northern spotted owl (*Strix occidentalis caurina*) demographics were studied since 1990. A year prior to these wildfires, high-resolution, remotely sensed forest structural information derived from light detection and ranging (lidar) data was acquired for an area that fully covered the extent of these fires. To quantify wildfire impact on northern spotted owl nesting/roosting habitat, we fit a relative habitat suitability model based on pre-fire locations used for nesting and roosting, and forest structure variables developed from 2012 lidar data. Our pre-fire habitat suitability model predicted nesting/roosting locations well, and variable response functions followed known resource selection patterns. These forests had typical characteristics of old-growth forest, with high density of large live trees, high canopy cover, and complex structure in canopy height. We projected the pre-fire model onto lidar data collected two months post-fire to produce a post-fire suitability map, which indicated that >93% of pre-fire habitat that burned at high severity was no longer suitable forest for nesting and roosting. We also quantified the probability that pre-fire nesting/roosting habitat would burn at each severity class (unburned/low, low, moderate, high). Pre-fire nesting/roosting habitat had lower probability of burning at moderate or high severity compared to other forest types under high burning conditions. Our results indicate that northern spotted owl habitat can buffer the negative effects of climate change by enhancing biodiversity and resistance to high-severity fires, which are predicted to increase in frequency and extent with climate change. Within this region, protecting large blocks of old forests could be an integral component of management plans that successfully maintain variability of forests in this mixed-ownership and mixed-severity fire regime landscape and enhance conservation of many species.

Key words: forest structure; habitat; lidar; mixed-severity fire regime; northern spotted owl; old forest; pre-fire vegetation condition; *Strix occidentalis caurina*.

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Introduction

Climate and land-use patterns are strong predictors of disturbance regimes that ultimately influence the structure and function of an ecosystem (Sousa 1984). Globally, forest ecosystems are at risk of large disturbance regime shifts (frequency and severity) and ultimately a range of possible alternative stable states due to climate change-induced drought and heat stress, and associated interactions with insect disease outbreaks and wildfire (Dale et al. 2001, Allen et al. 2010, Kitzberger et al. 2012). In the case of fire regimes, their frequency and severity are typically negatively correlated, such that frequent fires are of lower severity, and strongly influence community dynamics and successional pathways (Agee 2005). Fire regimes play a key role in species adaptations as well as community structure and distribution of ecosystems, including the availability of several key components of wildlife habitat (Bunnell 1995, Noss et al. 2006, Pausas and Keeley 2009). Persistence of native wildlife species that are adapted to historical fire regimes may be at risk given climate change and land management practices that alter patterns in fire frequency and intensity relative to historical patterns. For example, in many dry forests the extent of areas impacted by high-severity fire is increasing, with concern for sensitive wildlife species that rely on forest types altered by fire (Westerling et al. 2006, Miller et al. 2008, Miller and Safford 2012, Reilly et al. 2017, Rockweit et al. 2017).

The fire regime of an ecosystem is defined as the natural patterns of wildfire in a given area including fire frequency, seasonality, extent, severity, and synergistic effects with other disturbances (Agee 1993, Halofsky et al. 2011). Forest successional theory suggests that in most areas, the interval length between disturbances should influence outcomes of succession, such that early-seral stands, low stature, and open microclimates are common in ecosystems with short-interval fires, whereas those with long-interval fires generally are dominated by mature forests with relatively closed canopies (Donato et al. 2009, Halofsky et al. 2011). Low-severity regimes are most often associated with dry forest types which experience frequent and predominantly low-severity fires where loss of biomass due to fire is low, and <30% mortality of trees is typical (Agee 1993). This disturbance regime results in stands with open canopies and an understory dominated by sprouting and rhizomatous shrubs and herbaceous plants, which are described in historical accounts as open, parklike forests (Agee 2013). The extent of these forest types was often overrepresented in historical records due to the ease of traveling through them and the opportunities for pleasing photographs (Van Pelt 2008). In truth, these open, parklike forest conditions do not represent many forests in western North America (Odion et al. 2014). Forests in high-severity fire regimes experience infrequent (>200-yr return intervals) but high-severity fires. Large patches of total mortality occur within the fire events and overall mortality is high (>70%), though areas of low- and moderate-severity fire are also common (Agee 1993, Turner and Romme 1994). In western North America, these forest types associated with high-severity fire regimes are characteristic of high-elevation, lodgepole pine (*Pinus contorta*)-dominated stands, some spruce (*Picea* spp.)-dominated forests, and moist Douglas-fir (*Pseudotsuga menziesii*)/western hemlock (*Tsuga heterophylla*) forests of the Pacific Northwest (Agee 1993).

Within mixed-severity fires, 30–70% tree mortality is common; however, the mixed-severity regime is not simply intermediate between low- and high-severity fire regimes (Agee 1993, Perry et al. 2011). The resulting pattern of low-, moderate-, and high-severity fire patches within a given area is highly variable and difficult to predict (Agee 2005), although at a large enough spatial scale (e.g., watersheds), nearly all fires are mixed-severity (Turner and Romme 1994, Baker et al. 2007, Halofsky et al. 2011). This variability can occur at fine spatial and temporal scales dependent on previous fire history, topography, fuel continuity, vegetation type, and weather (Heyerdahl et al. 2001, Donato et al. 2009, Thompson and Spies 2009, Krawchuk et al. 2016). Because of the spatiotemporal variability across the landscape, mixed-severity fire regimes are the most complex and least understood fire regimes, unique in terms of patch metrics and the life history attributes of native species (Schoennagel et al. 2004, Agee 2005, Halofsky et al. 2011). Fire histories in mixed-severity regimes, in particular, are difficult to determine

because most fire history techniques have been developed to study either the low- or high-severity extremes in fire regimes (Agee 2005). Short-interval severe fires are an important characteristic of mixed-severity fire regimes and are typically considered extreme events and expected to be deleterious to forest succession and diversity (Donato et al. 2009). However, many native plants within these forests possess functional traits (e.g., persistent seed banks, vegetative sprouting, rapid maturation) lending to resilience to short-interval severe fires that result in distinct vegetation assemblages that enhance landscape heterogeneity inherent to mixed-severity fire regimes (Donato et al. 2009). Furthermore, high diversity of vegetation types, driven by short-interval repeat fires in a mixed-severity fire regime landscapes, plays an important role in conservation and the structure of avian communities (Fontaine et al. 2009).

Fire behavior is most strongly influenced by weather, topography, and fuels (i.e., aboveground vegetation biomass) interacting through multiple pathways and at multiple spatial scales (Agee 1993). Weather is perhaps the most important factor controlling fire behavior and severity, especially in mixed-severity regimes (Bessie and Johnson 1995, Collins et al. 2007, Thompson and Spies 2009, Bradstock et al. 2010). In moderate fire weather, topographical complexity and position (east- and south-facing, upper- and mid-slopes) have been shown to strongly influence fire intensity, with pre-fire vegetation condition and fire history also important predictors of severity (Estes et al. 2017). Under these conditions, shrubs and younger forests were more likely to burn at higher intensity than mature forests. In very high and severe fire weather, the amount (fuel loads), type (e.g., younger vs. older forest), and vertical and horizontal spatial arrangement of fuels (contiguous vs. unconnected) can be the primary driver of spatial patterns in mixed-severity fire (Zald and Dunn 2018). Furthermore, previous fires and post-fire management can set up the landscape for patterns of self-perpetuating high-severity fire in mixed-severity regimes (Donato et al. 2009, Thompson and Spies 2010). Even in drier forest types with high frequency of fire, certain topographic settings have lower fire frequencies where patches of dense, old forest can develop and persist as islands in a matrix of open, older forests (Camp et al. 1997, Krawchuk et al. 2016). With changing climates and land management practices, the size of patches of high-severity fire is increasing relative to historical patterns, with concern for sensitive species that rely on forests dramatically altered by fire (Westerling et al. 2006, Miller et al. 2008, Miller and Safford 2012, Reilly et al. 2017, Rockweit et al. 2017).

Northern spotted owls (*Strix occidentalis caurina*) are an obligate species of old forests in the Pacific Northwest of the United States and southwest Canada and typically nest in large old conifer trees (Wilk et al. 2018). The subspecies was listed as threatened under the U.S. Endangered Species Act because populations declined primarily as result of habitat loss due to large-scale harvest of late-successional forests (USFWS 1990). A variety of forest types are used by northern spotted owls for foraging, but nesting and roosting primarily occur in forests older than 125 yr of age. These older forests have average tree diameters above 50 cm and many trees exceed 75 cm diameter, canopy cover is usually >60%, and the forest has multiple canopy layers (Davis et al. 2016). The Northwest Forest Plan (NWFP) was designed to protect most remaining old forest and, after several decades, provide enough habitat on federal lands for viable populations of several old-forest species, primarily through a network of late-successional forest reserves (USDA and USDI 1994). On federal lands, loss of northern spotted owl habitat due to timber harvest has declined, but losses due to wildfires have increased in recent decades (Davis et al. 2016). Studies focused on the subspecies of northern spotted owls suggest that occupancy and survival generally decline after fire, especially if post-fire logging occurs (Clark et al. 2011, 2013, Rockweit et al. 2017). The effects of fire on individual northern spotted owls and habitat quality are complex and not fully understood (Lesmeister et al. 2018), but clearly suitability of forests for nesting and roosting decreases if canopy cover is reduced and with spatial aggregation of high-severity fire (Davis et al. 2016, Rockweit et al. 2017, Sovern et al. 2019).

Fire regimes within the range of northern spotted owls range from infrequent/high severity in the northern and coastal regions to frequent/low

severity in the eastern and southern regions (Spies et al. 2018). In between these two extremes is a broad area of mixed-severity regimes, including the Oregon Klamath, where recent wildfires have caused high rates of loss of old forests and threaten species associated with them (Spies et al. 2006, 2018). Wildfires within this regime are comprised of a mix of burn severities, with low-severity ranging from 45% to 54% of the burned area, moderate-severity from 24% to 36%, and high-severity fire from 23% to 26% (Reilly et al. 2017). While the frequency and extent of high-severity fire have been increasing due to a general increase in large wildfires within the owls range, there is no strong evidence that high-severity wildfire comprises a higher proportion of burned areas than it did historically (Miller and Safford 2012, Reilly et al. 2017).

Within the Klamath-Siskiyou ecoregion of southwestern Oregon, an area characterized as moderate-frequency, mixed-severity fire regime (Spies et al. 2018), northern spotted owl demographics have been studied on the Klamath demographic study area since 1990 (Dugger et al. 2016). In and near the study area, lightning from a thunderstorm on 26 July 2013 started 54 fires that burned under very high fire weather conditions and were managed as the Douglas Complex and Big Windy Fires (Zald and Dunn 2018). Most of the fires joined into several large fires that burned with mixed severity over an area of about 38,000 ha. Within the fire perimeter were large patches of high-severity fire and subsequent salvage logging, primarily on private lands and along roads on federal lands. The non-overlapping—but nearby—large mixed-severity wildfires burning simultaneously in a mixed-ownership and management landscape presented a unique landscape experiment to evaluate interactions between severity classes (unburned/low, low, moderate, and high) and vegetation condition (e.g., suitable or unsuitable forest for nesting and roosting by northern spotted owls). Further, the study area provided an exceptional opportunity to study responses of vegetation to fire because high-resolution remote sensing data of vegetation height provided by aerial light detection and ranging (lidar) were available pre- and post-fire, which provided an unprecedented ability to measure forest attributes before and immediately following the fires.

Our objectives were to (1) quantify the immediate impact of various wildfire severities on northern spotted owl nesting/roosting habitat, which has typical characteristics of old-growth forests in the Pacific Northwest; and (2) analyze the relative susceptibility of northern spotted owl nesting/roosting habitat to higher or lower severity fire. We hypothesized that northern spotted owl nesting/roosting habitat would be degraded as severity increased, but the relationship would be non-linear where habitat would not be degraded at low severity, only slightly degraded with moderate severity, and highly degraded with high severity. Because the area was in drought and fire weather was very high to severe, we expected the high fuel loading of northern spotted owl nesting/roosting habitat may cause these stands to burn at higher or equal severity than other forest types with less fuel (Weatherspoon et al. 1992). However, several lines of evidence suggest older forests with dense, multi-storied canopies are more resistant to high-severity wildfire during severe fire weather (e.g., Countryman 1955).

Methods

Study site

The study was conducted in the Klamath-Siskiyou ecoregion, which extends from northwestern California into southwestern Oregon (Fig. 1). The Douglas Complex and Big Windy Fires burned mostly within the boundary of the Klamath northern spotted owl demography study area (1422 km^2; Fig. 1) with elevations ranging from 610 to 1680 m. Annual precipitation ranged from 1500 to 3000 mm over the study area (http://prism.oregonstate.edu/), with <15% falling from May to September. The region is among the top global hotspots of species rarity and richness, identified as a global center of biodiversity, a World Wildlife Fund globally outstanding ecoregion (www.worldwildlife.org/publications/global-200), and an IUCN area of global botanical significance (Olson and Dinerstein 1998, Noss 2000). The complexities of climate, topography, biogeographic patterns, geology, and mixed-severity fire regime in the Klamath and Siskiyou Mountains create one of the four richest temperate coniferous forests in the world with high endemism, species richness, and unique community assemblages (Noss et al. 1999, Vance-Borland

1999). Forests were dominated by Douglas-fir, ponderosa pine (*P. ponderosa*), sugar pine (*P. lambertiana*), and incense cedar (*Calocedrus decurrens*) and mixed with a variety of other conifers (*Pinus* spp. and grand fir *Abies grandis*) and hardwoods (e.g., Pacific madrone *Arbutus menziesii*, golden chinquapin *Castanopsis chrysophylla*, and oak *Quercus* spp.).

Within the Klamath-Siskiyou ecoregion, a complex and variable fire regime prevails, dominated by frequent mixed-severity and very frequent mixed-severity fires (Fig. 1; Spies et al. 2018). Historical fire severity varied in spatial scale, patchiness, and fire-return intervals (c. 5–75 yr), but overall exhibiting mixed severity over time and space (Agee 1993, Taylor and Skinner 1998, Perry et al. 2011). When a stand-replacing fire occurs, rapid recovery of vegetation and fuel continuity, coupled with dry summers and frequent lightning, create the potential for recurrent high-severity fires over decadal timescales (Thompson et al. 2007). Thus, short-interval severe fires have likely been a component of the complex fire regime and a factor structuring vegetation in the region (Agee 1993, Donato et al. 2009).

Fire data

We used daily fire perimeter map data for the Douglas Complex Fires that burned with mixed

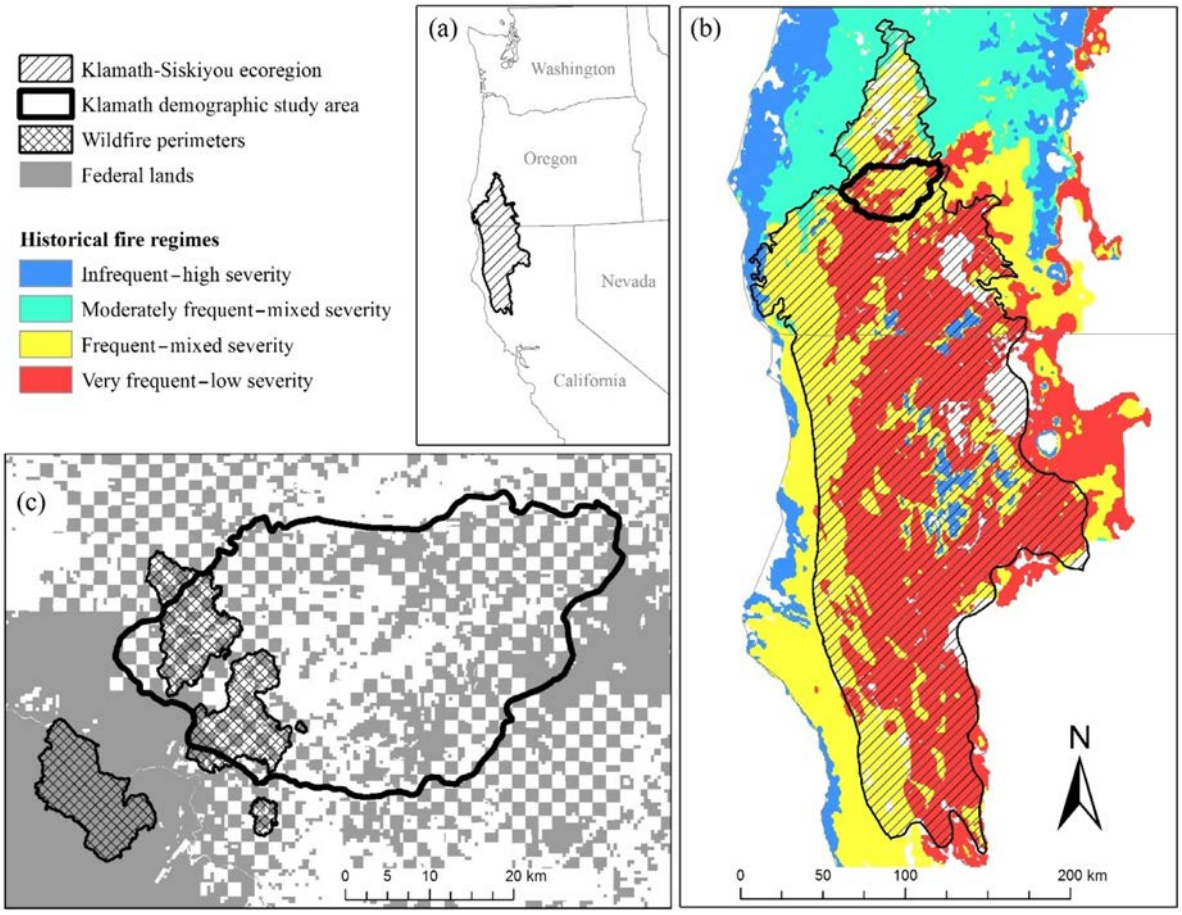

Fig. 1. Maps showing (a) the Klamath-Siskiyou ecoregion of California and Oregon, USA (hatched area); (b) historical fire regimes in the Klamath-Siskiyou ecoregion (Spies et al. 2018), Klamath northern spotted owl demography study area (1422 km^2; center = 123.315° W, 42.782° N, heavy black border); and (c) landownership (federal land, gray; private land, white) and the 2013 Douglas Complex and Big Windy Fires (cross-hatched area).

severity: Dads Creek (final perimeter = 9890 ha), Rabbit Mountain (9706 ha), and Brimstone (928 ha); and for the Big Windy Fire (10,799 ha; Fig. 2). Low precipitation in 2013 resulted in moderate-to-severe drought conditions in southern Oregon (NDMC 2018) and contributed to active fire behavior in the early burning period of these fires. Zald and Dunn (2018; and unpublished data) summarized weather data for the first 4 d of the Douglas and Big Windy Complexes (see Fig. 2 for fourth-day fire perimeters) from three Remote Automatic Weather Stations near fires and found maximum temperature was 25–32°C, minimum relative humidity was 17–30%, and maximum wind speed was 19–29 kmh. After the fourth day of the fire, a temperature inversion developed—a common occurrence in this region (Estes et al. 2017)—which dramatically changed fire behavior and greatly improved the effectiveness of suppression efforts. Mean daily burning index (BI) for the first 4 d of the fire was 52–76, which was above the

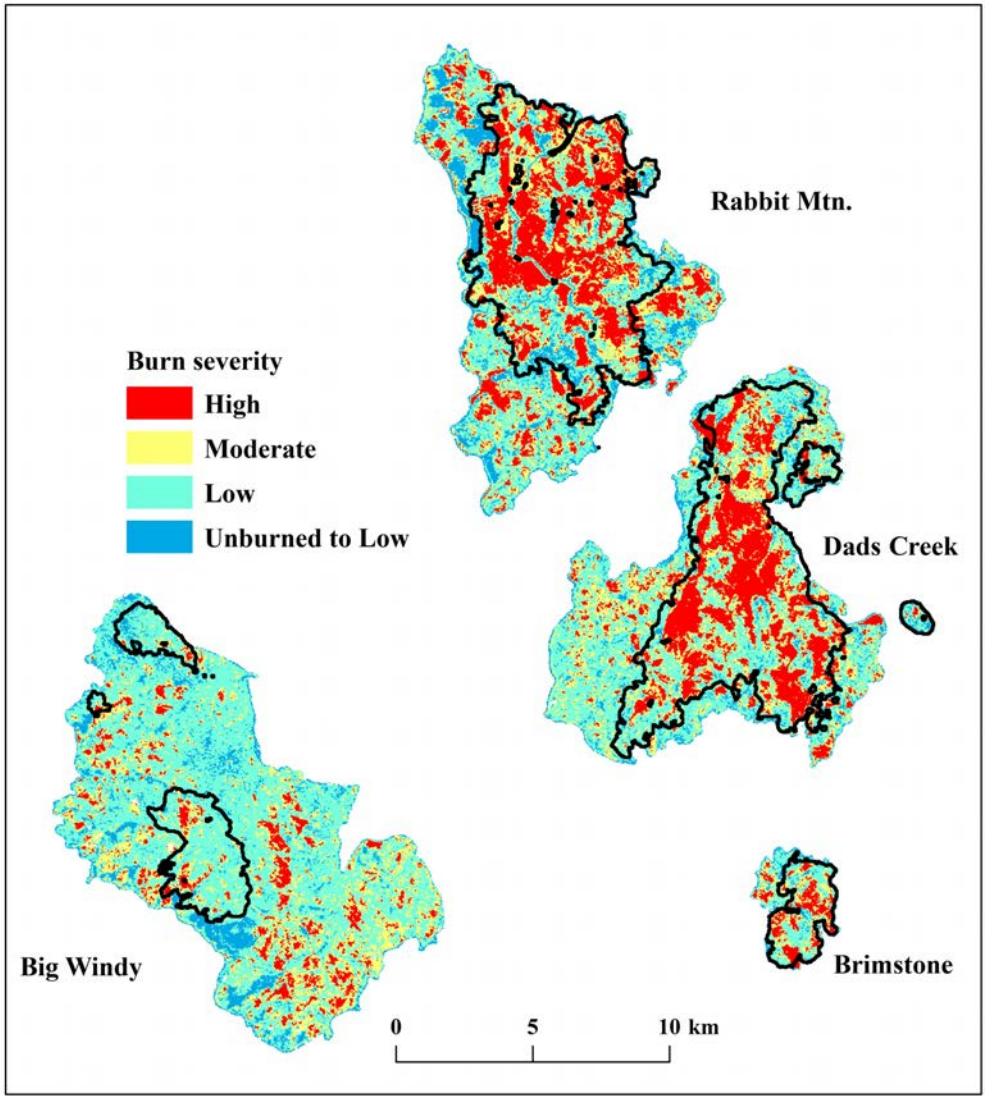

Fig. 2. Map of monitoring trends in burn severity (Eidenshink et al. 2007) data for the Big Windy and Douglas Complex Fires in southwest Oregon, USA, 2013. Severity is based on change in normalized burn ratio (dNBR) from Landsat-8 images from pre- and post-fire. The perimeter of the fires after the fourth day is outlined in black.

historic (1991–2017 1 June–30 September) 90th percentile for this period (Zald and Dunn 2018). Mean daily energy release component (ERC) values ranged from 49 to 67, also above the 90th percentile for this area (Dalton et al. 2015) for 3 of 4 d. Burning index is a fire behavior index proportional to flame length that incorporates wind speed estimates, and ERC is an index of fire energy that includes the cumulative drying effect of weather in the days prior to the estimate and measures live and dead fuel moisture (Bradshaw et al. 1983, Cohen and Deeming 1985). Post-fire logging occurred over much of the high-severity portions of the private lands, but most federal land was unlogged post-fire because the area was designated as a late-successional reserve under the NWFP. The areas of the Douglas Complex Fires were primarily composed of Oregon and California Railroad Lands with federal lands, managed by the U.S. Bureau of Land Management, in a checkerboard pattern with private lands (Fig. 1; Zald and Dunn 2018). The Big Windy Fire burned within an intact landscape of federally managed forest lands (Fig. 1).

Pre- and post-fire habitat suitability

We used program MaxEnt version 3.3.3k (Phillips et al. 2006) to produce a pre-fire relative nesting/roosting habitat suitability model of forests used by northern spotted owls and applied the model algorithm to post-fire forest conditions to map post-fire suitability. MaxEnt is based on the maximum information entropy theory and is widely used to develop resource selection functions through the use of machine learning applied to known species locations (i.e., model training data) and relevant environmental predictor variables (Harte and Newman 2014). Previous efforts also used machine learning to develop nesting/roosting cover type models in several northern spotted owl studies and monitoring reports (Davis et al. 2011, 2016, Glenn et al. 2017). We followed Ackers et al. (2015) by using lidar-derived forest structure variables to develop a model of suitable forest for northern spotted owl nesting and roosting.

We used site locations where northern spotted owls nested and roosted within the demographic study area as training and testing data for relative habitat suitability models. These location data were collected during long-term research of northern spotted owl demography, including survival rates, reproductive rates, and annual rate of population change. The protocol used to determine site occupancy, nesting, and reproductive status for this study followed the guidelines specified by monitoring effectiveness of the NWFP (Franklin et al. 1996, Dugger et al. 2016).

We derived our pre- and post-fire model predictor variables from multiple-return discrete lidar data acquired in 2012 (1 yr pre-fire) and 2013 (2 months post-fire) by Quantum Spatial (previously Watershed Sciences, Corvallis, Oregon, USA) using aircraft-mounted Leica ALS 50 and/or Leica ALS 60 sensors with an average point density of ≥10 points per square meter. The 2012 data were collected as part of the Oregon Lidar Consortium (OLC) Rogue River lidar acquisition, covering an area of ~567,000 ha. Within this OLC Rogue River collection area, ~50,000 ha of lidar data were acquired again in 2013 post-wildfire, encompassing the Douglas complex and Big Windy Fires. We processed all lidar metrics from delivered point clouds, creating 1-m-resolution models of highest (i.e., first) return and bare earth digital elevation models (DEMs) with FUSION/LDV software (McGaughey 2015).

Following Ackers et al. (2015), we derived four metrics from the lidar data known to be important drivers in northern spotted owl nesting and roosting ecology: percentage overstory canopy cover (CANOPY), mean overstory canopy height (HEIGHT), density of large live trees (LARGE TREES), and rumple index (RUMPLE; Parker et al. 2004). We calculated the percent CANOPY taller than 2 m and the mean vegetation height using only first returns at 30 m resolution. We calculated RUMPLE, a measure of stand structure diversity where higher values represent stands with more horizontal and vertical complexity, using a 3 × 3 window focal mean of the 1-m canopy height model (CHM; Ackers et al. 2015). We matched the resolution of the HEIGHT and CANOPY metrics using a cell multiplier of 30 and then derived RUMPLE from the surface area ratio output. We calculated LARGE TREES from point files representing large live tree (≥31 m tall) locations from the 1-m CHM and CanopyMaxima in FUSION/LDV (McGaughey 2015). The tree height threshold of 31 m was the average height of 80-yr-old trees based on a

height–age relationship of trees in forest inventory plots from the study area. To minimize the chance of having multiple points for the same tree, we created 10 m radius buffers around all points in ArcGIS 10.1 (ESRI, Redlands, California, USA), dissolved overlapping buffers, and then created a new point layer from the centers of the dissolved buffers. Any trees that were mapped only in the post-fire LARGE TREES map were added to the pre-fire model (with the assumption that large trees present after the fire were present prior to fires).

Northern spotted owl presence data for model training and testing were based on 107 nesting or roosting locations from 27 territories. Given that presence data originated from a long-term northern spotted owl study area, we were confident that we met sampling assumptions of minimal sampling bias and high probability of detecting owls when they were present. We followed standard procedures for presence-only modeling to avoid multi-collinearity between model variables by restricting modeling response functions that were overly complex, using stepwise calibration, and testing of bootstrapped model replicates (O'Brien 2007, Phillips and Elith 2013, Merow et al. 2014). We followed the model selection method used by Ackers et al. (2015) by using a random subset of our owl location data (75%) and 10,000 random modeling region locations to develop bootstrapped replicate models that related location data to random environmental conditions. We used the held-out 25% of northern spotted owl locations to test model predictions. We made stepwise adjustments to the model regularization multipliers that serve as a penalty parameter in machine learning by eliminating model coefficients and keeping only those that increase model gain, which relates to the likelihood ratio of an average species location to average background environmental conditions. Higher gains produce better differentiation of species locations from background conditions. The best model was based on balancing two criteria: (1) minimizing the difference between regularized training gain and test gain to avoid over-fitting the models, while (2) maximizing model test statistics (area under the curve [AUC] and Spearman rank correlation [Rs]). Once the best model was selected, we used the predicted vs. expected (P/E) curve to classify the model into a binary map of suitable and unsuitable nesting/roosting habitat (Hirzel et al. 2006).

Burn severity and change in suitability

We assumed most of the negative effects of wildfire on northern spotted owl nesting/roosting habitat would result from loss of canopy cover and mortality of large trees. To capture changes in the large, live tree component (LARGE TREES), we needed to estimate the proportion of LARGE TREES that suffered mortality by fire severity to adjust our post-fire LARGE TREES variable for the post-fire nesting/roosting habitat model. However, initial examination of the lidar data indicated that the post-fire lidar data could not differentiate live vs. dead trees ≥31 m height, leading to a bias in the lidar-based LARGE TREES variable. Previous research has indicated that lidar variables are better predictors for live and total basal area while multispectral imagery variables (e.g., Landsat data) are better predictors for dead and percent dead basal area (Bright et al. 2014). For example, changes in normalized burn ratio (NBR) are commonly used for mapping forest disturbance, especially timber harvest and wildfire (Miller and Thode 2007, Kennedy et al. 2010, 2012, Schroeder et al. 2011). In particular, changes in NBR have been widely used to assess fire severity (Miller et al. 2009, 2012, Cansler and McKenzie 2012, Lydersen et al. 2016). Furthermore, changes in NBR have been effectively related to changes in canopy cover (Miller et al. 2009) and basal area (Reilly et al. 2017). In this study, we used changes in satellite-based NBR from Landsat-8 to assess changes in canopy cover, and thus tree mortality, in live trees ≥31 m height to avoid biases produced by directly calculating changes in LARGE TREES from pre- and post-fire lidar data.

To assess canopy cover losses, and thus large live tree mortality associated with the fire, we acquired two spatial datasets to be used for mapping vegetation change within the fire perimeters: (1) We used Google Earth Engine (Google Earth Engine Team 2015, Gorelick et al. 2017) to collect 30-m-resolution Landsat-8 LaSRC imagery for the study area from 1 May to 1 August of 2013 and 2014 to generate pre- and post-fire NBR maps; and (2) we used post-fire high-resolution (7.62 cm) imagery acquired concurrently with lidar acquisition to estimate tree canopy

cover. For all 30 × 30 m (900 m^2) pixels in the study area, we calculated NBR in 2013 (pre-fire) and 2014 (post-fire) as the normalized differences between near-infrared and shortwave-infrared bands (bands 5 and 7, respectively; Li et al. 2013) for each Landsat-8 image. For our study area, no single image was optimal (e.g., cloud cover over part of the area on a given date), so we created a median composite image of NBR for each growing season (May–August; Kennedy et al. 2012). Large, live trees represented by LARGE TREES were only located in older forests; therefore, we measured live tree canopy cover visible in the high-resolution aerial photographs at 200 randomly generated 30 × 30 m (900 m^2) plots within older forests (95th percentile lidar return height ≥30.8 m) inside the study area snapped to the 2014 Landsat-8 pixel boundaries. Within each plot, 36 systematically distributed sampling points were established and tree canopy cover was measured as the proportion of sampling points where we observed live tree crowns in the high-resolution imagery. Plots co-located with roads, timber salvage, young plantations, or lacking clear imagery (e.g., steep slope in shadow) were excluded from our analysis, resulting in a final sample size of n = 181 that included post-fire canopy cover in forests experiencing a variety of fire severity conditions. Note that canopy cover measurements collected at these sample locations represent only live tree canopy cover and were independent from lidar-based canopy cover estimates that include both live and dead trees.

Statistical models relating NBR change and forest change (e.g., basal area mortality; Reilly et al. 2017) are available, but we did not have reliable measurements of canopy cover change based on both pre- and post-fire aerial photographs upon which we could parameterize a model. Pre-fire aerial imagery could not be used in conjunction with post-fire aerial imagery to calculate change in canopy cover directly because of the lower resolution images and differing parallax (i.e., an apparent shift in the position of objects as viewed from differing vantage points) between pre- and post-fire images. Therefore, an accurate assessment of cover change between photographs was unreliable. Additionally, published models were not parameterized for our landscape, but rather broad regional datasets for California (Miller et al. 2009) or Oregon and Washington (Reilly et al. 2017). Because only post-fire reference data for canopy cover (high-resolution aerial photographs) were available, we developed a mortality algorithm based on changes in forest canopy cover predicted from NBR data. The algorithm (1) predicted live canopy cover based on post-fire NBR and canopy cover measurements from aerial photography, (2) calculated the change in predicted canopy cover from the pre-fire to post-fire conditions, and (3) assigned mortality to LARGE TREES with probability proportional to the change in Landsat-based canopy cover.

Because tree canopy cover data were non-negative, we modeled tree canopy cover as a function of NBR with a zero-truncated regression model (Fig. 3). The model was fit to the 2014 NBR (post-fire) and tree canopy cover data in the R statistical environment version 3.3.1 (R Core Team 2016) with the function tobit (AER package; Kleiber and Zeileis 2009). For each 30-m Landsat pixel, tree canopy cover predictions for pre- and post-fire were generated by applying the fitted model to 2013 (before fire ignition) and

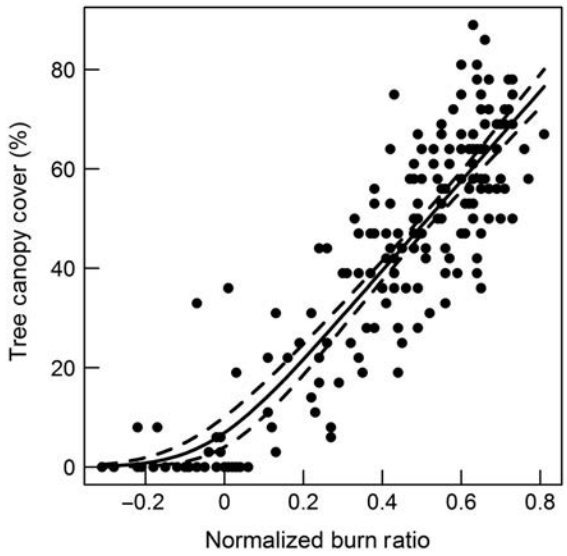

Fig. 3. Mean (solid line) and 95% confidence intervals (dashed lines) for predicted live tree canopy cover as a function of normalized burn ratio within the Douglas Complex and Big Windy Fires in southwest Oregon, USA, in 2013 based on the zero-truncated regression model.

2014 NBR data, respectively. To minimize differences between 2013 and 2014 canopy cover maps, we normalized the 2013 NBR data so that the differences between 2013 and 2014 NBR outside the fire perimeter were minimized. We transformed the 2013 NBR image by creating a mask of high NBR (stable forest, both 2013 and 2014 NBR were >0.75) outside the fire boundaries, and within the study area, which served as the population for creating a normalization between the two image dates. We then created a simple least-squares linear fit between NBR 2013 and NBR 2014 based on all pixels in the mask population, with a slope of 0.845 and intercept of 0.119 based on estimated coefficients. We created the transformed NBR 2013 by applying slope/intercept from linear fit, thereby transforming the 2013 image calibrated to the values in the 2014 image and quantified differences.

Pre- and post-fire predictions of canopy cover were differenced and divided by the predicted pre-fire canopy cover to calculate the proportional change in canopy cover (ΔC). The probability of mortality for a given 30-m pixel on the landscape was taken to be $1 - \Delta C$ (i.e., canopy cover-weighted tree mortality). Areas with canopy cover increases (i.e., $\Delta C > 0$) were assumed to have no tree mortality. We assessed the performance of the canopy cover-weighted mortality by comparing our predictions for each pixel with a large live tree with an independent basal area-weighted mortality prediction generated using existing models (Appendix S1; Reilly et al. 2017). We use these data for validation because the models produced by Reilly et al. (2017) predict basal area-weighted tree mortality from a regional forest inventory network based on RdNBR ($r^2 = 0.68$) and perform particularly well in identifying patches of forest experiencing basal area-weighted mortality >75% (classification accuracy = 82.8%).

Large tree mortality within each pixel was assigned proportional to $1 - \Delta C$. For a given pixel with n canopy dominant trees identified based on lidar imagery, a sample $n \times (1 - \Delta C)$ trees, rounded to the nearest integer, was taken and recorded as having died during the fire, with the remaining $n \times \Delta C$ trees surviving. This assumes that the number of trees dying during the fire was proportional to the canopy cover losses and that the identity of trees dying does not matter. For canopy dominant trees examined in this paper, such an assumption seems reasonable. We, therefore, used the mortality algorithm to modify our post-fire point file of tree stems to estimate which trees mapped by lidar suffered mortality. We then used the post-fire live tree point file to generate our post-fire LARGE TREES density variable for nesting/roosting habitat modeling.

We recognize that by leveraging multiple datasets and modeling techniques—lidar-based LARGE TREES and satellite-based canopy cover-weighted mortality—there is the opportunity to propagation of error from one step to another. For example, errors in estimating forest carbon stocks may arise from field data collection, allometric equations, and modeling errors (Clough et al. 2016). In the case of this study, errors associated with canopy cover modeling, the calculation of canopy cover-weighted mortality, and the application of that mortality to attribute tree death to individual trees all contribute to overall errors.

Pre-fire vegetation vs. fire severity analysis

Our main interest was to examine the relationship between fire severity and nesting/roosting habitat with limited confounding effects of fire suppression activities and differences in fire weather during the time the fire burned. Though it is difficult to separate the confounding effects of suppression efforts when analyzing almost all fires, we reasoned we could minimize this effect by examining the early days of the fire before more extensive backfiring occurred and suppression activities had limited effect. Thus, we used the spatial extent of daily fire growth (as mapped using aerial IR technology each night) throughout the first 4 d after ignition. Starting at approximately day 5 of the fire, changes in atmospheric temperature altered fire weather conditions and suppression efforts included igniting backfires in some areas (K. Kosel, *personal communication*; Fig. 2). Additionally, by focusing on these rapid fire growth days we believe there is little to no alteration of natural fire behavior or severity across the spectrum of northern spotted owl nesting/roosting habitat suitability. To quantify the odds of forest types burning in 1 of 4 severity types, we evaluated the ratios of the proportion of suitable and unsuitable nesting/roosting

habitat that burned (B) at each fire severity to what was available to burn (A). Fire severity types were taken from Monitoring Trends in Burn Severity (MTBS 2017) data, a map product based on changes in NBR commonly used by forest management agencies. The types include high severity, moderate severity, low severity, and unburned to low severity. By using the same fire severity classifications commonly used by land managers, communication and application of results from this research will be more straightforward. A value of B/A < 1 indicates that the forest type burned less than would have been expected by chance, and a ratio B/A > 1 indicates it burned more than would be expected by chance (Moreira et al. 2001, 2009, Manly et al. 2010). While the canopy cover-weighted mortality modeling we used to attribute large tree mortality depends on NBR and is thus likely related to the MTBS fire severity classes, we use the MTBS classes for summarizing across severity classes because of their widely accepted use in forest planning.

Results

Pre- and post-fire habitat suitability

Our best model of nesting/roosting habitat suitability predicted nesting/roosting locations well with an AUC statistic of 0.89 and a P/E curve Spearman rank correlation of 0.92. The binary classification of the habitat model into suitable and unsuitable was based on P/E = 1 (0.32). Model variable response functions (Fig. 4) followed known resource selection patterns by owls (Ackers et al. 2015, Glenn et al. 2017).

Burn severity and change in suitability

Post-fire nesting/roosting habitat suitability decreased with increasing fire severity (Table 1),

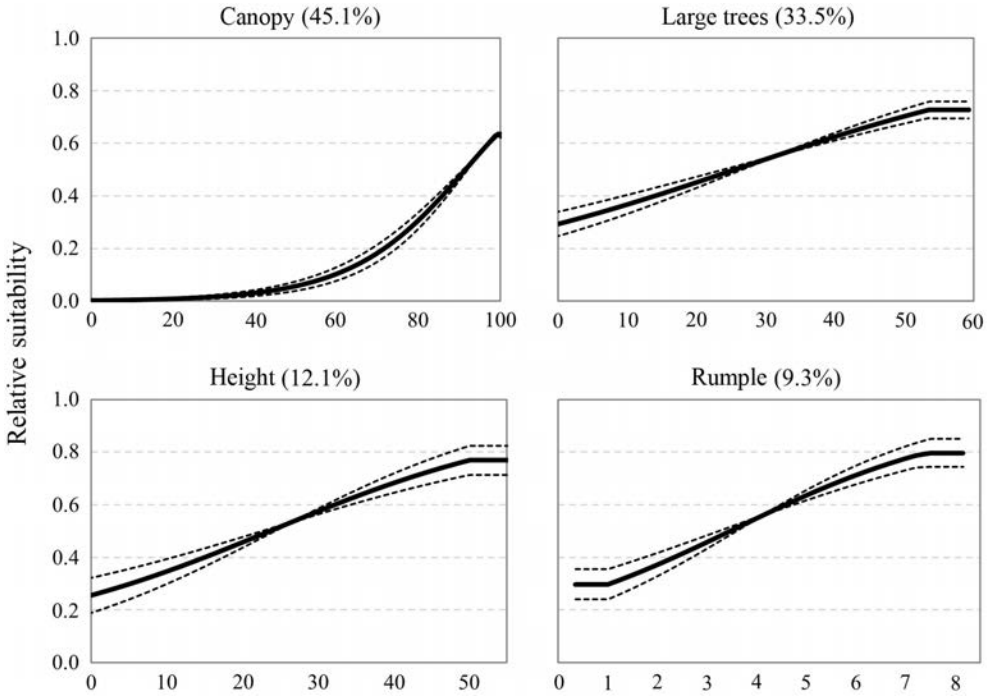

Fig. 4. Variable response functions with percent contribution (%) to pre-fire nesting/roosting habitat suitability model for northern spotted owls in the Klamath demographic study area in southwest Oregon, USA, where the Douglas Complex and Big Windy Fires burned in 2013. The solid line represents the mean, and the dashed lines represent 95% confidence intervals. Variables were derived from lidar data, and the variables included were CANOPY (percent canopy cover), LARGE TREES (large live trees per hectare), RUMPLE (rumple index), and HEIGHT (mean tree height [m]).

Table 1. Metrics within areas burned at four severity classes based on Monitoring Trends in Burn Severity (MTBS) measurements.

Fire severity	Pre-fire live trees	Trees killed	% Mort	Mean pre-fire NBR	Mean post-fire NBR	Δ Mean NBR (%)	Mean pre-fire suitability	Mean post-fire suitability	% Loss suitable habitat
Unburned to low	66,015	2830	4	0.75	0.68	−9.2	0.22	0.20	4.5
Low	251,356	49,413	20	0.74	0.56	−24.6	0.22	0.21	25.5
Moderate	71,826	40,038	56	0.72	0.30	−58.3	0.10	0.08	63.9
High	67,897	62,348	92	0.75	−0.04	−104.9	0.12	0.03	93.7

Notes: Reported are estimated number of large live trees pre-fire, estimated number large live trees killed during fire, percentage of large live trees killed, mean normalized burn ratio (NBR) pre (2013)- and post-fire (2014), percent change in NBR, pre (2012)- and post-fire (2013) mean nesting/roosting habitat suitability, and percent loss of suitable nesting/roosting habitat for northern spotted owls in the Douglas Complex and Big Windy wildfires in southwest Oregon during 2013.

mainly owing to fire-caused decreases in LARGE TREES and CANOPY. Low-severity fire had little effect on nesting/roosting habitat suitability. High-severity fire resulted in 75% decrease in mean suitability and >93% loss of suitable nesting/roosting habitat (Table 1) and commonly converted pre-fire suitable forests to conditions that were unsuitable for nesting and roosting (Fig. 5). Overall, most pre-fire habitat was lost if it burned at moderate severity (Table 1), but depending on the pre-fire suitability, moderate-severity fire produced mixed effects on nesting/roosting habitat suitability and did not consistently result in a loss of suitability. The forests that burned at unburned to low severities had pre-fire suitability values approximately two times higher than suitability of forests that burned at moderate or high severity (Table 1); thus, moderate- to high-severity fire had the greatest effect on pre-fire areas with low habitat suitability for northern spotted owls (Fig. 6).

Tree mortality and pre-fire vegetation vs fire severity

Canopy cover-weighted mortality (Appendix S1: Fig. S1) generated as the basis of attributing post-fire tree mortality for large trees exhibited a slight positive bias (mean error = 2.42% mortality) and root mean square deviation of 5.82% compared to an existing basal area-weighted mortality model based on regional forest inventory datasets co-located with large wildfires (Reilly et al. 2017). Despite these errors, our canopy cover-weighted mortality predictions were highly correlated with the existing basal area-weighted mortality predictions (Pearson correlation = 0.99).

Based on lidar tree mapping and the post-fire NBR analysis, we estimated the fires directly killed a total of 154,629 large live trees (51.1% of total pre-fire estimate). Tree mortality increased with fire severity and percent change in NBR (Table 1). There were 2.27 times more large live trees in areas that experienced unburned to low-severity fire compared to those areas that burned at moderate and high severity (Table 1). The susceptibility of forests to moderate- and high-severity fire was lower in suitable nesting/roosting habitat and higher in unsuitable forest than would be expected by chance (Fig. 6). The differences between low and moderate/high severity were more pronounced in suitable nesting/roosting habitat than unsuitable forest. The odds that suitable nesting/roosting habitat would burn at lower severity was 2–3 times higher than the odds it would burn at moderate-to-high severity. There were significant differences (based on non-overlapping 95% confidence intervals) between odds of burning at low severity and burning at moderate/high severity among forest types. There was no evidence for a difference between the odds (i.e., B/A index) of burning at moderate or high severity within suitable nesting/roosting habitat or unsuitable forest types, but there were differences between suitable and unsuitable forest types (Fig. 6). The odds that unsuitable forest burned at moderate-to-high severity was about twice that of suitable nesting/roosting habitat.

Discussion

Here, we used newly developed tools and lidar data to examine the interaction between mixed-severity fires and northern spotted owl

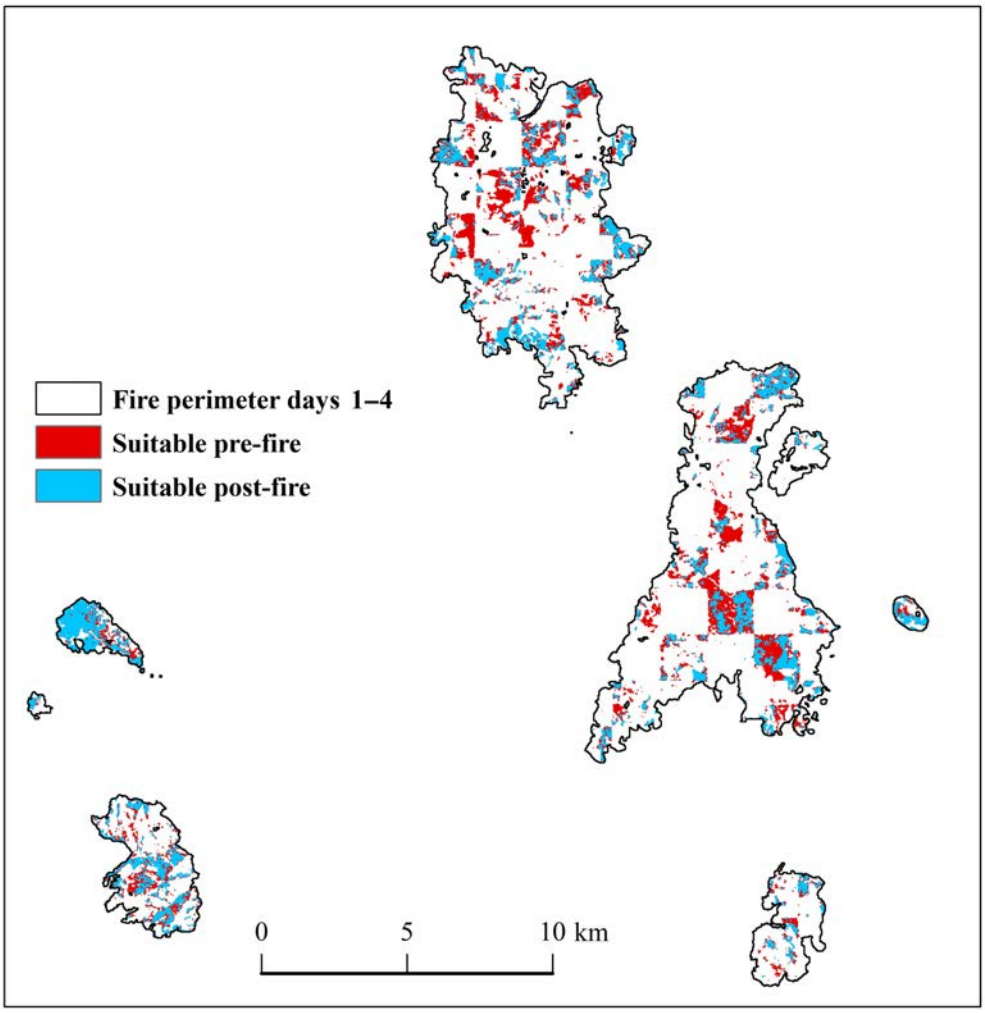

Fig. 5. Patterns of conversion from suitable habitat to unsuitable conditions for northern spotted owl nesting and roosting in the Douglas Complex and Big Windy Fires that burned in southwestern Oregon, USA. Binary classification of nesting/roosting habitat was based on predicted vs. expected ratio threshold of 0.32, and lidar metrics of live vegetation height, canopy cover, stand complexity (rumple index), and large tree density. Area shown is the perimeter of the fires 4 d after the fire ignited on 26 July 2013.

nesting/roosting habitat under high fire weather conditions in a landscape characterized by the interactions between land-use patterns and a mixed-severity fire regime. Because of high site fidelity, northern spotted owls may continue to use areas if suitable nesting/roosting cover remains and prey are available. However, survival decreases through time in areas with a high proportion of high-severity fire likely because post-fire habitat quality decreases to the point that territories are only marginally capable of supporting northern spotted owls (Rockweit et al. 2017). Within a few years post-fire, areas opened up by tree mortality change structurally (i.e., standing dead trees transitioning to fallen logs) and prey may be less accessible with high density of shrubs and herbaceous understory in high-severity burn areas. As expected, in our study the suitability of northern spotted owl nesting/roosting habitat decreased with increasing fire severity, to the degree that much of the pre-fire habitat that burned at high severity was no longer suitable cover for nesting or roosting. The greatest impacts from moderate- and high-severity fire

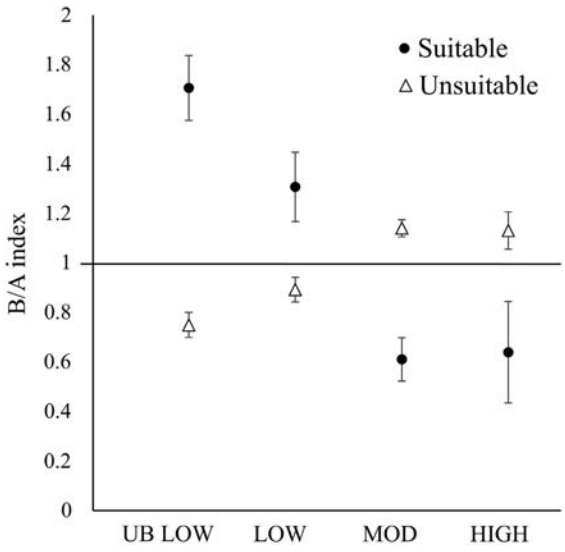

Fig. 6. Ratio of proportion of suitable and unsuitable nesting/roosting habitat that burned (B) at each fire severity to what was available (A) to burn (B/A index) with 95% confidence intervals, Douglas Complex and Big Windy Fires, southwestern Oregon, USA, 2013. We used Monitoring Trends in Burn Severity (MTBS 2017) to determine fire severity types (UB LOW, unburned to low severity; LOW, low severity; MOD, moderate severity; HIGH, high severity) and separated into suitable nesting/roosting habitat for northern spotted owls or unsuitable forest types based on lidar metrics. B/A index < 1 indicates that the forest type (suitable or unsuitable) burned at the severity class less than would have been expected by chance, and B/A index > 1 indicates forest type burned at the class more than by chance alone.

were observed in those forests exhibiting low habitat suitability for northern spotted owl nesting and roosting before the fire.

We found that the old-forest conditions associated with northern spotted owl habitat burned at lower severity despite having higher fuel loading than other forest types on the landscape. The microclimate and forest structure likely played a key role in lower fire severity in nesting/roosting habitat compared to other forest types. As succession progresses and canopy cover of shade-tolerant tree species increases, forests eventually gain old-growth characteristics and become less likely to burn because of higher relative humidity in soil and air, less heating of the forest floor due to shade, lower temperatures, lower wind speeds, and more compact litter layers (Countryman 1955, Chen et al. 1996, Kitzberger et al. 2012, Frey et al. 2016, Spies et al. 2018). In addition, as the herbaceous and shrub layer is reduced by shading from lower to mid-layer canopy trees, the connection between surface fuels and the canopy declines, despite possible increases in canopy layering (Halofsky et al. 2011, Odion et al. 2014). Alexander et al. (2006) found that in the Klamath-Siskiyou ecoregion, southern aspects tended to burn with greater severity, but exogenous factors also played an important role because areas with large trees burned less and had less fire damage than areas dominated by smaller trees. On the 2002 Biscuit Fire that burned near our study area, Thompson and Spies (2009) concluded that weather and pre-fire vegetation conditions were the primary determinants of crown damage. They found that forests with small-stature vegetation and areas of open tree canopies and dense shrubs experienced the highest levels of tree crown damage, while older, closed-canopy forests with high levels of large conifer cover were associated with the lowest levels of tree crown damage. The moisture content of air and soil in a forest affects the amount of fuel moisture, and thus the probability of ignition and burning temperature (Heyerdahl et al. 2001). In addition to the potential to mitigate negative effects of climate warming at local scales by creating refugia and enhancing biodiversity (Frey et al. 2016), we suggest that northern spotted owl nesting/roosting habitat also has the potential to function as fire refugia (i.e., areas with higher probability of escaping high-severity fire compared to other areas on landscape) in areas with mixed-severity fire regimes under most weather conditions. Thus, in these landscapes, management strategies to conserve old-growth characteristics may also reduce risk of high-severity wildfire (Bradley et al. 2016) and serve as buffer to negative effects of climate change (Betts et al. 2018).

Although it has long been recognized that older forests have lower flammability than other forest types (Countryman 1955), federal agencies are often criticized for not extensively managing old forests to reduce risk of high-severity fire (OFRI 2010). The perception is that forest succession leads to increased flammability with age

(Kitzberger et al. 2012, Duff et al. 2017). Where this view may be correct is in dry forests with historically very frequent fire-return intervals (<10 yr), and contemporary increased fuel continuity has resulted from fire exclusion and led to increased sizes of high-severity patches when fires burn under extreme weather (Reilly et al. 2017). In the driest forest types, fire exclusion converts open forests with grassy understories to dense forests with high fuel loads, and the increased fuel continuity can result in larger patches of high-severity fire than would have occurred historically. In other forest types, succession likely decreases risk of high-severity fire. Compared to older forest, younger forests have lower canopies and thinner barked trees that reduce resistance to fire, and thinned young forests can be susceptible to high mortality from fire unless surface fuels are treated with prescribed fire (Raymond and Peterson 2005). Thinned forests have more open conditions, which are associated with higher temperatures, lower relative humidity, higher wind speeds, and increasing fire intensity. Furthermore, live and dead fuels in young forest or thinned stands with dense saplings or shrub understory will be drier, making ignition and high heat more likely, and the rate of spread higher because of the relative lack of wind breaks provided by closed canopies with large trees.

Primarily as inputs to fire models that estimate likely fire behavior, fuel models involve typing forested stands according to fuel loading and are often used to explore or inform management directions because fuels are under the purview of forest managers (Deeming and Brown 1975, Anderson 1982, Bradshaw et al. 1983, Finney 2004, Scott and Burgan 2005, Andrews 2009). Suitable nesting/roosting habitat often falls in classes rated as highly burnable, with fast rates of fire spread, high flame lengths, and intense fire behavior (Anderson 1982). Thus, fire model results can show nesting/roosting habitat has higher burn probabilities and higher crown fire potential than adjacent areas (Ager et al. 2007, 2012). The results of this study as well as other recent studies show that these older forests in mixed-conifer forest environments are less susceptible to high-severity fire than other successional stages, even under high fire weather conditions and with short return intervals <15 yr (Donato et al. 2009). Running fire models for our study area based on conditions during the Douglas Complex and Big Windy Fires would be a worthwhile exercise to evaluate model predictions relative to the actual behavior of those fires. However, based on the findings of this study and many others (see review by Duff et al. 2017), we contend that fire models that continue to use fuel models that rate older forests with higher relative fire behavior will likely overestimate fire severity and inflate estimated loss of old forests in the Pacific Northwest. An alternative is to consider forest fuels in a more holistic manner and alternative age–flammability models (Kitzberger et al. 2012, Duff et al. 2017).

Intensive management (especially on timber industry lands) that results in reduced fuel loading does not always equate to less frequent or severe fire. Results by Charnley et al. (2017) in southcentral Oregon showed that private industry lands had more than three times the percentage area of open-canopy forest compared to U.S. Forest Service-managed lands that included thinning trees <53.3 cm diameter, prescribed fire, and no active management. Federal land management practices resulted in forests with more resilience to high-severity wildfire as opposed to management on private lands (Charnley et al. 2017). Furthermore, Zald and Dunn (2018) found that ownership patterns were the best predictor for high-severity fire in the Douglas Complex Fires, where federal lands, with primarily older forests in late-successional reserves, burned at lower severity than non-federal forests that were primarily private timber industry lands.

Gradual changes in temperature or precipitation patterns may have little effect until a disturbance-driven threshold is reached at which a large shift occurs that might be difficult or impossible to reverse (Scheffer and Carpenter 2003). Peterson (2002) described "ecological memory" and how previous patterns of disturbance can predispose an area to follow a certain disturbance pathway. For example, a landscape that experiences severe disturbance (e.g., high-severity fire, clear-cut logging, post-fire salvage logging) can be predisposed to high-severity fire in a mixed-severity fire regime (Thompson et al. 2007, Donato et al. 2009, Thompson and Spies 2009, Zald and Dunn 2018). High-severity wildfire can alter soil and successional pathways and potentially shift the system into an alternative stable state (Peterson 2002). A

key component of overall ecosystem function and sustainability occurs belowground, and with high-severity fire, changes in the soil physical, chemical, and biological functions can be deleterious to the entire ecosystem caused by changes in successional rates and species composition (Neary et al. 1999). Conversely, low-severity fire effects on soil can promote herbaceous flora, increase plant diversity, increase available nutrients, and thin over-crowded forests, all of which can enhance healthy forest ecosystems (Neary et al. 1999). The time for recovery of belowground systems is a key driver of ecosystem processes and depends on burning intensity and on previous land-use practices. Soils are greatly altered and degraded in young intensively managed forest and post-salvage logged sites, which are more susceptible to repeat and short-interval high-severity wildfire, and these forests that experience multiple rapid successions of natural and human-derived disturbances may cross thresholds and be changed catastrophically (Lindenmayer and Noss 2006).

The Klamath-Siskiyou ecoregion is currently dominated by biodiverse temperate coniferous forest and may be near a tipping point toward an alternative stable state (shrub/hardwood chaparral) with extensive loss of conifer forest, dominance by deciduous trees and shrubs, and recurring early-seral and young forest conditions (Tepley et al. 2017, Serra-Diaz et al. 2018). The region has experienced short intervals between recent high-severity fires coupled with intensive timber management in this mixed-severity fire regime area, and the likelihood of further shortening of fire-return intervals with climate change (Davis et al. 2017). Even where climate is suitable to sustain dense mature forests, early-seral and non-forest conditions may perpetuate because of a cycle of short-interval repeat burning and timber harvest and have dramatic impacts on biodiversity and wildlife habitats (Lindenmayer et al. 2011, Tepley et al. 2017). Under this scenario, the persistence of old-forest associated species, including northern spotted owls, within the Klamath-Siskiyou ecoregion would be further threatened.

It was recognized early in the history of northern spotted owl conservation that fire would play a major role in determining the success of management plans (Agee and Edmunds 1992). The 2011 federal northern spotted owl recovery plan calls for increasing fire resiliency in dry forests with focus on active management outside of northern spotted owl core areas to meet project goals (USFWS 2011). For many dry forests in the western United States that historically experienced frequent, low- to moderate-severity fire regimes, prescribed fire and mechanical treatments have been effective at reducing surface fuel loads, forest structure, and potential fire severity (Stephens et al. 2009). In mixed-severity landscapes, the fire severity mosaic is highly variable and the effects of topography and climate are strong predictors for this regime, but forest conditions also are important and much less predictable and stable (Beaty and Taylor 2001), further complicating management decisions aimed at increasing fire resiliency of forests. Management actions employed in dry forest types to reduce wildfire risk may not work equivalently in mixed-severity regimes. Active management actions that include mechanical treatments degrade suitability of forests for nesting and roosting by northern spotted owls (Lesmeister et al. 2018) and may not always decrease risk of high-severity fire. Further, considering trends and forecasts for earlier spring snowmelt and longer fire seasons, climate change may exacerbate the effects of wildfire (Dale et al. 2001, Westerling et al. 2006), and thus the framed conundrum between northern spotted owl habitat and fire management in mixed-severity regimes. Our results indicate that older forest in late-successional reserves (i.e., northern spotted owl nesting/roosting habitat) with no active management can serve as a buffer to the effects of climate change and associated increase in wildfire occurrence. These multi-storied old forests in these environments enhance biodiversity and have the highest probability to persist through fire even in weather conditions associated with high fire activity.

Fuel-reduction treatments such as mechanical thinning can effectively reduce fire severity in the short term, but these treatments, by themselves, may not effectively mitigate long-term dynamics of fire behavior under severe weather conditions and may not restore the natural complexity of historical stand and landscape structure (Schoennagel et al. 2004). On the other hand, prescribed fire that mimics severity and return intervals of natural fire regimes in forests that historically

experienced fire can result in landscapes that are both self-regulating and resilient to fire (Parks et al. 2015). Prescribed fire is generally considered to be the most effective way to reduce the likelihood of high-severity fire in combination with mechanical treatments (Stephens et al. 2009). The 2013 Rim Fire in the Sierra Nevada, California, USA, burned with low severity in areas previously treated with prescribed fires, suggesting that prescribed burning was an effective management tool to reduce fire severity (Harris and Taylor 2017). Many fire-prone forests will require active management to restore ecosystem function, but no single prescription will be appropriate for all areas and, in some portions of the forests, minimal maintenance may be more sustainable in the long term (Noss et al. 2006). Within the Klamath-Siskiyou ecoregion, flexible and multi-scale land management approaches that promote diversity of forest types will likely enhance conservation of a range of species requiring different forest conditions for long-term persistence. An integral component of these approaches could include resistance strategies (i.e., no active management) to protect high-value older forest (Millar et al. 2007) and prescribed fire to promote and maintain a mix of forest conditions in this landscape characterized by mixed-ownership and mixed-severity fire regime. Ultimately, spatial heterogeneity that includes the buffering effects of northern spotted owl nesting/roosting habitat may serve as a stabilizing mechanism to climate change and reduce tendency toward large-scale catastrophic regime shifts.

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Supporting Information

Additional Supporting Information may be found online at: http://onlinelibrary.wiley.com/doi/10.1002/ecs2.2696/full

ATTACHMENT L

EXHIBIT D

ATTACHMENT L

Ecological Importance of Large-Diameter Trees in a Temperate Mixed-Conifer Forest

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Abstract

Large-diameter trees dominate the structure, dynamics and function of many temperate and tropical forests. Although both scaling theory and competition theory make predictions about the relative composition and spatial patterns of large-diameter trees compared to smaller diameter trees, these predictions are rarely tested. We established a 25.6 ha permanent plot within which we tagged and mapped all trees ≥1 cm dbh, all snags ≥10 cm dbh, and all shrub patches ≥2 m^2. We sampled downed woody debris, litter, and duff with line intercept transects. Aboveground live biomass of the 23 woody species was 507.9 Mg/ha, of which 503.8 Mg/ha was trees (SD = 114.3 Mg/ha) and 4.1 Mg/ha was shrubs. Aboveground live and dead biomass was 652.0 Mg/ha. Large-diameter trees comprised 1.4% of individuals but 49.4% of biomass, with biomass dominated by *Abies concolor* and *Pinus lambertiana* (93.0% of tree biomass). The large-diameter component dominated the biomass of snags (59.5%) and contributed significantly to that of woody debris (36.6%). Traditional scaling theory was not a good model for either the relationship between tree radii and tree abundance or tree biomass. Spatial patterning of large-diameter trees of the three most abundant species differed from that of small-diameter conspecifics. For *A. concolor* and *P. lambertiana*, as well as all trees pooled, large-diameter and small-diameter trees were spatially segregated through inter-tree distances <10 m. Competition alone was insufficient to explain the spatial patterns of large-diameter trees and spatial relationships between large-diameter and small-diameter trees. Long-term observations may reveal regulation of forest biomass and spatial structure by fire, wind, pathogens, and insects in Sierra Nevada mixed-conifer forests. Sustaining ecosystem functions such as carbon storage or provision of specialist species habitat will likely require different management strategies when the functions are performed primarily by a few large trees as opposed to many smaller trees.

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Introduction

Large-diameter trees dominate the structure, dynamics, and function of many temperate and tropical forest ecosystems and are of considerable scientific and social interest. They comprise a large fraction of forest wood volume, biomass and carbon stocks [1,2], and modulate stand-level leaf area, transpiration, and microclimates [3,4]. Large-diameter trees contribute disproportionately to reproduction [5], influence the rate and pattern of tree regeneration and forest succession [6], and originate further disturbance by crushing or injuring neighboring trees when they fall to the ground [7,8]. Arboreal wildlife species preferentially occupy large trees as habitat (e.g. [9]), and the greater structural complexity of large tree crowns [10] supports habitat for obligate wildlife species (e.g. [11]), unique epiphyte communities [12], and soil development and water storage within the forest canopy [13].

Large-diameter trees continue to contribute disproportionately to forest ecosystem structure and function after they die. Dead large-diameter trees persist as standing snags for many years, providing additional wildlife habitat. In temperate forests large-diameter logs may persist on the forest floor for centuries, where they continue to provide habitat for diverse assemblages of vertebrates and invertebrates and microorganisms, store carbon and other nutrients, serve as substrates for tree regeneration, and play numerous other functional roles [14,15].

Human societies derive many non-timber values from large-diameter trees. Tree ring chronologies from large trees provide long records of past forest development and disturbance [16], as well as proxy records of annual climatic variation [17]: they are an important source of the data required to test and refine ecological theories and models. Large trees are culturally [18] and spiritually important [19] in many societies; individuals and organizations maintain large tree registries (e.g., [20]), and government agencies manage parks and preserves dedicated to the conservation of exceptionally large trees, such as Redwood and Sequoia & Kings Canyon National Parks in California, USA.

Populations of large-diameter trees can be intractable study subjects. Large-diameter trees occur at low densities and estimates

of their abundance, spatial patterns, and contributions to ecosystem function (e.g. biomass) are subject to high rates of sampling error [21,22]. Consequently, descriptive statistics and hypothesis tests for large-diameter trees require very large sample plots [22]. The combination of low abundance and low mortality rates [8,23,24] make detecting changes in demographic rates or spatial patterns of large-diameter trees even more difficult, further underscoring the requirement for large sample plots. Conventional studies based on small (1 ha to 4 ha) plots often do not contain enough large-diameter trees to conduct even community-level (i.e., pooled across species) analyses (e.g., [24]). Consequently, despite their ecological and cultural significance, relatively less is known – and with greater uncertainty – about the abundance, distribution, and dynamics of large-diameter trees.

Predictions for large-diameter trees

Scaling theory and competition theory both provide frameworks for predictions about the relative contributions of large-diameter structures to aboveground biomass, the spatial distribution of large-diameter trees, and the spatial relationships between large-diameter and small-diameter trees. Scaling theory predicts that a relatively few trees in the largest diameter classes will dominate stand-level aboveground biomass [25,26], and that there are continuous relationships between tree diameter and density, and total forest biomass. However, scaling theory has been repeatedly shown to underpredict large tree densities and mortality rates [27,28]. This discrepancy likely arises because trees rarely die from competition once they reach large sizes but rather succumb to biological agents, physical disturbances, and combinations thereof [8,29]. Although scaling theory predicts dominance of biomass pools by a few large individuals, the simplifying assumptions about tree mortality embedded in the theory may render it inadequate to predict accurately either the aggregate large tree contributions to stand biomass or the local-scale variation. We were interested in quantifying the actual contribution of large-diameter pieces to aboveground biomass pools—which should be substantial [14]—because predictions from scaling theory alone may not be accurate enough to serve as inputs into ecosystem models or to support sound natural resource policies and management.

Tree spatial patterns integrate past tree-tree interactions. Competition theory predicts that distance and density-dependent growth and mortality during forest development will lead to increasingly uniform spatial patterns in larger diameter classes [30,31]. Therefore, the arrangement of large-diameter trees should be more uniform than small-diameter trees, and the largest trees should exhibit spatial regularity at the tree neighborhood scale. Competition theory also predicts spatial relationships between large and small-diameter trees. When large trees compete asymmetrically with small trees their respective spatial locations become segregated because seedlings preferentially survive and grow into understory trees where they are not suppressed by larger competitors [30,32,33].

Our study was motivated by three purposes: (1) determine the degree to which predictions from ecological theory hold for contemporary populations of large-diameter trees; (2) establish a permanent forest research plot of sufficient size to detect and attribute forest ecosystem change, including for the large-diameter component, in order to test future predictions against longitudinal data; and (3) support current management efforts to restore large-diameter tree populations in Sierra Nevada mixed-conifer forest, which were dramatically reduced by widespread logging throughout the range of this important forest type during the 19th and 20th centuries [34,35]. We established the Yosemite Forest Dynamics Plot (YFDP) in an old-growth Sierra Nevada mixed-conifer forest and within the plot quantified the relative contribution of large-diameter trees, snags, and down woody debris to the aboveground biomass pools, the comparative spatial patterns of large-diameter and small-diameter trees, and spatial relationships between them.

Results

Species composition

In the 25.6 ha of the Yosemite Forest Dynamics Plot (YFDP), there were 34,458 live stems ≥1 cm dbh of 11 tree species (Table 1) and 3.87 ha (15.1%) of continuous shrub cover comprising 12 shrub species that reach 1 cm in diameter at 1.37 m height (Table 2). Eleven plant families were represented. All woody stems were native plants. Live tree basal area was 64.3 m^2/ha and biomass was 503.8 Mg/ha (SD = 114.3 Mg/ha) (Table 3). Of the three principal species by biomass (*Pinus lambertiana*, *Abies concolor*, and *Calocedrus decurrens*), *P. lambertiana* had a much higher average biomass (Fig. 1) and exhibited a rotated-sigmoid diameter distribution, possibly reflecting lower mortality of middle-aged individuals (Fig. 2). Diameter distributions of *A. concolor* and *C. decurrens* followed negative exponential distributions (Fig. 2). Relative dominance of *Abies concolor* declines at diameters above ~90 cm (Fig. 2). *Calocedrus decurrens* exhibits almost an order of magnitude less biomass than either *P. lambertiana* or *A. concolor* (Fig. 2). However, some individuals do persist into large diameter classes (Fig. 2). Live shrub biomass was 4.1 Mg/ha (Table 2). There were 2,697 snags (19.9% of living trees of this diameter). Biomass of snags ≥10 cm dbh was 43.0 Mg/ha (Table 3). Biomass of the forest floor components (Table 3, Fig. 3) was 53.1 Mg/ha for down woody debris (SD = 102.9 Mg/ha) and 48.0 Mg/ha (SD = 22.5) for fine fuels (Table 3). Litter and duff averaged 1.05 cm (SD = 0.38) and 1.20 cm (SD = 0.68) in depth, respectively. A correlogram analysis of woody debris volumes as estimated by the 20 m line intercept segments showed no spatial correlation in fuel loads at any distance. Total above-ground biomass of living and dead components was 652.0 Mg/ha.

Large-diameter composition

The large diameter component dominated most biomass pools (Table 3). For living trees, 1.4% of individuals had dbh ≥100 cm dbh (19.1 large-diameter trees ha^{-1}), but these individuals comprised 49.4% of tree biomass. For snags, 12.4% were large-diameter, comprising 59.5% of snag biomass. Snags ≥100 cm dbh were about half as numerous (42.9%) as live trees ≥100 cm dbh. There were 10 pieces of woody debris ≥100 cm (3.8%) measured on the line intercepts, and the large debris component comprised 36.6% of down woody debris biomass. There is, by definition, no large-diameter component to shrubs, fine fuels, litter or duff. Overall, large-diameter structures constituted 44.9% of aboveground live and dead biomass.

Scaling theory was informative for the relationship between tree density and diameter class ($r^2 = 0.84$); the theoretical relationship under-predicted the density of medium and large trees, but over-predicted the density of trees ≥170 cm dbh (Fig. 2). Although informative, the relationship between tree density and diameter class was better explained by a negative exponential distribution ($r^2 = 0.99$). The theoretical relationship between tree radii and biomass was not informative ($r^2 = 0.00$) (Fig. 2).

Spatial patterns

Small-diameter subpopulations of *A. concolor*, *C. decurrens*, *P. lambertiana*, as well as all tree species combined, exhibited significant aggregation relative to the null model of complete spatial randomness (CSR) from 0–9 m (Monte Carlo goodness-of-

Table 1. Tree species within the Yosemite Forest Dynamics Plot in 2010.

Tree species	Family	Density (stems/ha)	Basal area (m^2/ha)	Stems ≥ 1 cm dbh	Stems ≥ 10 cm dbh	Stems ≥ 100 cm dbh	Large-diameter prop. (%)
Trees ≥1 cm dbh							
Abies concolor	Pinaceae	956.3	29.28	24,481	9,634	103	0.4
Pinus lambertiana	Pinaceae	185.5	28.75	4,748	2,166	339	7.1
Cornus nuttallii	Cornaceae	92.5	0.26	2,368	287	-	-
Calocedrus decurrens	Cupressaceae	62.2	4.78	1,592	685	45	2.8
Quercus kelloggii	Fagaceae	43.3	1.12	1,109	735	-	-
Prunus spp.	Rosaceae	5.0	t	128	-	-	-
Abies magnifica	Pinaceae	0.4	0.06	11	5	1	9.1
Salix scouleriana	Salicaceae	0.4	t	11	-	-	-
Pseudotsuga menziesii	Pinaceae	0.2	0.03	6	3	1	16.7
Pinus ponderosa	Pinaceae	t	0.01	2	1	-	-
Rhamnus californica	Rhamnaceae	t	t	1	-	-	-
Live tree total		1,346.0	64.32	34,458	13,516	489	1.4
Snags ≥10 cm dbh							
Abies concolor					1,971	64	3.2
Pinus lambertiana					530	133	25.1
Quercus kelloggii					127	-	-
Calocedrus decurrens					46	5	10.9
Pseudotsuga menziesii					1	1	100.0
Cornus nuttallii					1	-	-
Unknown					21	7	33.3
Dead tree total					2,697	210	7.8

t – trace; less than one tree per 10 ha; less than 0.01 m^2/ha.
doi:10.1371/journal.pone.0036131.t001

Table 2. Shrub species occurring in patches of continuous cover ≥2 m^2 within the Yosemite Forest Dynamics Plot in 2010.

Species	Family	Cover (m^2)	Demography plot data		YFDP extrapolation	
			Density[a] (stems/m^2)	Biomass (kg/m^2)	Density (stems/ha)	Biomass (Mg/ha)
Arctostaphylos patula	Ericaceae	2,524	5.333	14.747	526	1.454
Ceanothus cordulatus	Rhamnaceae	1,220	1.667	1.189	79	0.057
Ceanothus integerrimus	Rhamnaceae	194	7.875	10.427	60	0.079
Ceanothus parvifolius	Rhamnaceae	187	3.250	1.527	24	0.011
Chrysolepis sempervirens	Fagaceae	13,082	3.167	1.464	1,618	0.748
Corylus cornuta var. *californica*	Betulaceae	13,310	1.000	1.565	520	0.814
Cornus serecia	Cornaceae	2,320	8.667	6.087	785	0.552
Leucothoe davisiae	Ericaceae	2,151	0.250	2.430	21	0.204
Vaccinium uliginosum	Ericaceae	2,937	0.083	1.069	10	0.123
Sambucus racemosa[b]	Adoxaceae	13	1.000	1.565	t	0.001
Rhododendron occidentale[c]	Ericaceae	687	0.083	1.069	2	0.029
Ribes nevadense[c]	Grossulariaceae	7	0.083	1.069	t	t
Ribes roezlii[d]	Grossulariaceae	66	0	0.534	0	0.001
Total		38,698			3,645	4.103

Baseline density and biomass equations were generated from 25, 2 m×2 m shrub demography plots, and allometric equations from [90].
[a]Stems ≥1 cm dbh.
[b]Substituted biomass and density for *Corylus cornuta* var. *californica*.
[c]Substituted biomass and density for *Vaccinium uliginosum*.
[d]Substituted one half the biomass of *Vaccinium uliginosum*. No stems reach 1 cm dbh.
t – trace; <1 stem/ha; <1 kg/ha.
doi:10.1371/journal.pone.0036131.t002

Table 3. Biomass within the Yosemite Forest Dynamics Plot in 2010.

Tree species	Biomass ≥1 cm (Mg/ha)		Biomass ≥10 cm (Mg/ha)		Biomass ≥100 cm (Mg/ha)		Large-diameter prop. (%)
Trees ≥1 cm							
Abies concolor	214.703	(37.505)	210.533	(36.916)	47.983	(8.950)	22.3
Pinus lambertiana	254.039	(66.623)	253.380	(66.508)	187.345	(47.594)	73.7
Cornus nuttallii	1.411	(0.301)	0.765	(0.199)	-	-	-
Calocedrus decurrens	24.978	(7.911)	24.764	(7.845)	12.964	(4.076)	51.9
Quercus kelloggii	7.849	(1.935)	7.736	(1.907)	-	-	-
Prunus spp.	0.005	(0.002)	-	-	-	-	-
Abies magnifica	0.609	(0.110)	0.609	(0.110)	0.469	(0.078)	77.0
Salix scouleriana	t	t	-	-	-	-	-
Pseudotsuga menziesii	0.146	(0.033)	0.144	(0.032)	0.134	(0.030)	91.8
Pinus ponderosa	0.064	(0.003)	0.064	(0.003)	-	-	-
Rhamnus californica	t	t	-	-	-	-	-
Live tree total	503.804	(114.346)	497.994	(113.444)	248.896	(60.651)	49.4
Snags ≥10 cm							
Abies concolor			20.276		6.708		33.1
Pinus lambertiana			21.167		17.959		84.8
Quercus kelloggii			0.244		-		-
Calocedrus decurrens			0.893		0.551		61.7
Pseudotsuga menziesii			0.196		0.196		100.0
Cornus nuttallii			t		-		-
Unknown			0.181		0.147		81.2
Dead tree total			42.958		25.562		59.5
Forest floor woody debris ≥10 cm			53.099	(102.897)	19.444	(78.977)	36.6
Shrubs total	4.103		-		-		-
Forest floor fine fuels†							
100-hour fuels	4.562	(4.820)	-		-		-
10-hour fuels	5.176	(3.487)	-		-		-
1-hour fuels	1.129	(0.834)	-		-		-
Litter	13.150	(6.244)	-		-		-
Duff	24.017	(16.517)	-		-		-
Total fine fuels	48.034	(22.495)	-		-		-

Biomass is shown to three significant figures (corresponding to 1 kg/ha) to facilitate comparison between less abundant, small-diameter species and more abundant species (standard deviation shown in parentheses). Standard deviation of tree biomass was based on the root mean squared error of the underlying allometric equations, and standard deviation of down woody debris biomass was based on Brown's method [89]. Biomass of shrubs and snags are derived from cover (m^2) or measured dimensions and fixed wood density values [see Methods]. Total of living and dead biomass pools was 652.0 Mg/ha.
t – trace; less than 1 kg/ha.
†Fine litter measured by fuel classifications [88]. 100-hour fuels are defined as twigs and fragments with diameter 1″ to 3″ (2.5 cm to 7.6 cm); 10-hour fuels have diameter 0.25″ to 1″ (0.6 cm to 2.5 cm); 1-hour fuels have diameter 0″ to 0.25″ (0 cm to 0.6 cm). Litter and duff are measured by depth.
doi:10.1371/journal.pone.0036131.t003

fit tests; *A. concolor*: $P = 0.004$; *C. decurrens*: $P = 0.001$; *P. lambertiana*: $P = 0.001$, all trees: $P = 0.004$). In other words, when averaged across all points in a given pattern, small-diameter trees of these species have more neighbors of the same type located within a circle with a radius of 9 m than would be expected if tree locations were completely independent of each other. $\hat{L}(r)$ values for small-diameter stems of both *P. lambertiana* and *A. concolor* rose steeply at small scales (Fig. 4), reaching a plateau at about 20 m, indicating that the strong spatial aggregation in these respective subpopulations primarily manifests at scales <20 m. The $\hat{L}(r)$ curves for small-diameter *C. decurrens* stems rose steadily from 0–80 m, indicating moderate but consistent clustering across the entire range of scales analyzed (Fig. 4).

The spatial arrangement of large-diameter *A. concolor*, *C. decurrens* and *P. lambertiana* individually, and for all species combined, were not different from complete spatial randomness from 0–9 m (Monte Carlo goodness-of-fit tests; *A. concolor*: $P = 0.012$; *C. decurrens*: $P = 0.074$; *P. lambertiana*: $P = 0.132$; all trees: $P = 0.057$). However, the behavior of the individual $\hat{L}(r)$ curves from 0–80 m reveals spatial structure within large-diameter *A. concolor* and *P. lambertiana* subpopulations at other interpoint distances (Fig. 4). The empirical $\hat{L}(r)$ curve (Fig. 4) for large-diameter *P. lambertiana* was negative and steadily decreased from 0–2 m, tracking the lower boundary of the simulation envelope, indicating spatial inhibition at these scales. From 2–4 m the large-diameter *P. lambertiana* $\hat{L}(r)$ curve sharply increased, providing evidence of

ATTACHMENT L

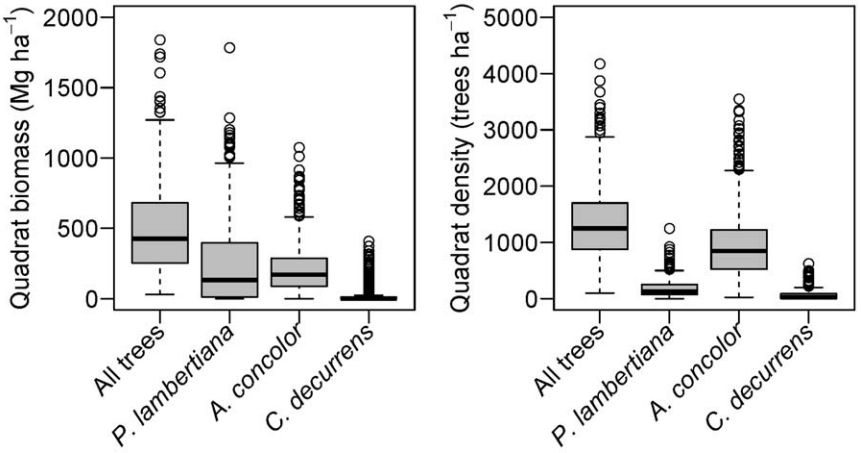

Figure 1. Heterogeneity in biomass and density of the principal tree species of the Yosemite Forest Dynamics Plot. Each boxplot represents values from the 640, 20 m×20 m quadrats of the plot.
doi:10.1371/journal.pone.0036131.g001

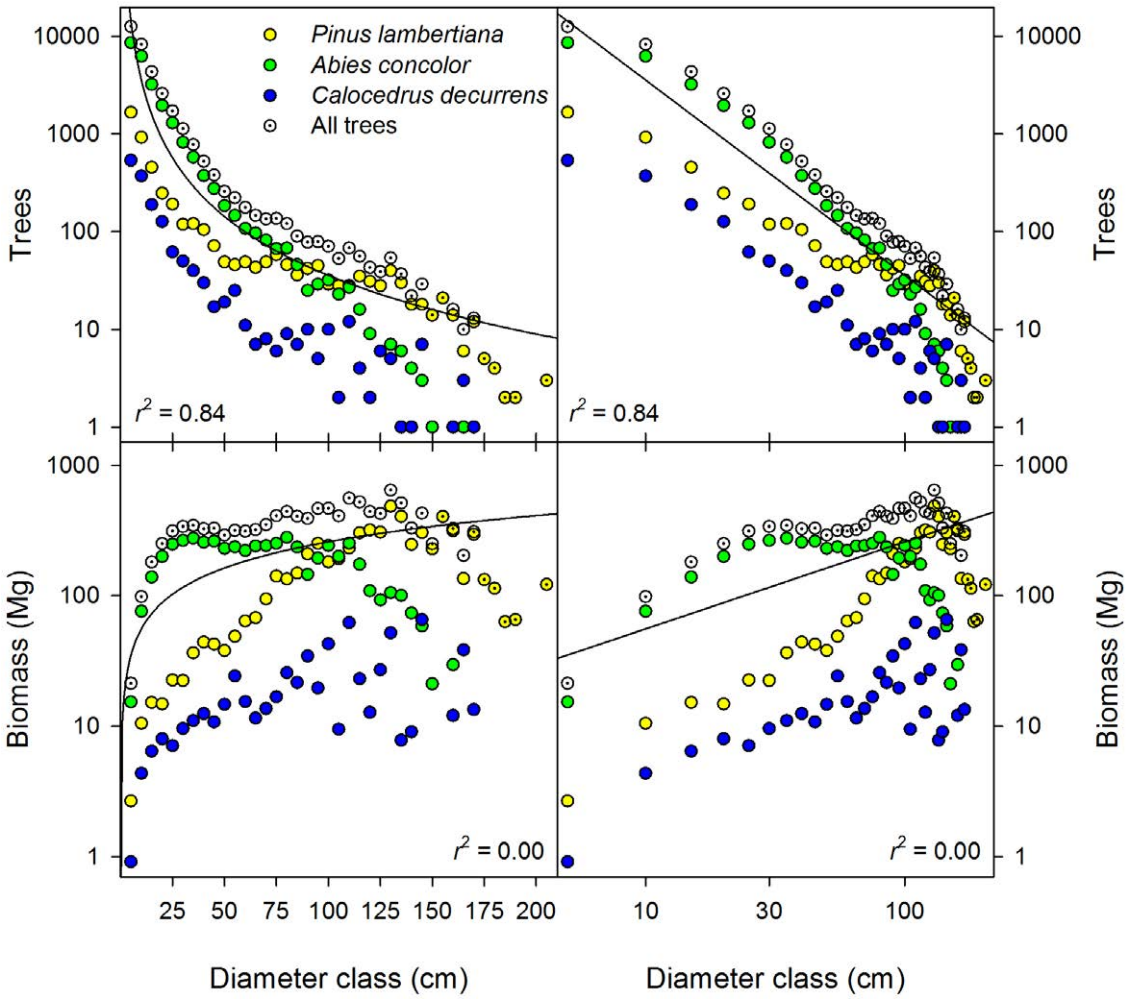

Figure 2. Diameter distribution of the number of trees and the biomass of trees in the Yosemite Forest Dynamics Plot. Each point represents a 5 cm diameter class (first bin; 1 cm≤dbh<5 cm) of the trees from the entire 25.6 ha plot (34,458 live stems ≥1 cm dbh totaling 12,897 Mg); identical data are shown with linear diameter bins (left) and log diameter (right). Solid lines represent the best fitting equation of the form specified by scaling theory, $tree\ density = Ar^{-2}$ ($r^2 = 0.84$) and $biomass = Br^{2/3}$ ($r^2 = 0.00$), where r is tree radius.
doi:10.1371/journal.pone.0036131.g002

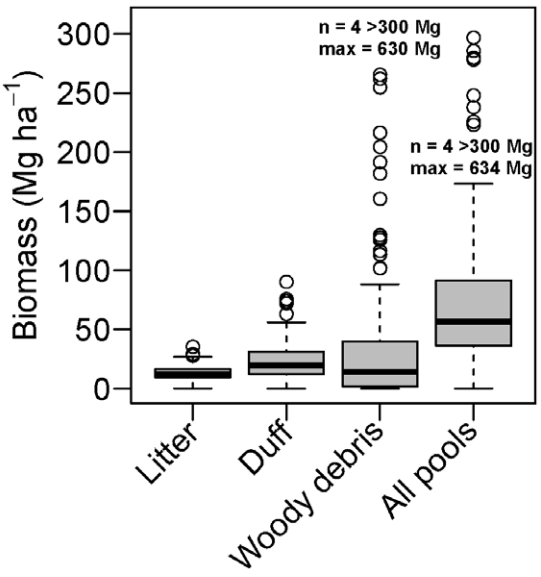

Figure 3. Biomass of forest floor components of the Yosemite Forest Dynamics Plot. Each boxplot represents values from 112 transects of 20 m (2.24 km of line transects). Outliers represent intercepted pieces of large-diameter debris.
doi:10.1371/journal.pone.0036131.g003

spatial clustering at these scales, with continued evidence for clustering occurring out to 22 m, where the empirical value reached the upper bound of the simulation envelope. Large-diameter *A. concolor* also exhibited rapid changes in spatial pattern at small scales, with steadily decreasing $\hat{L}(r)$ values from 0–3 m (evidence of spatial inhibition) then increasing sharply from 3–5.5 m, indicating strong spatial clustering over this short range of scales. A sustained increase in the $\hat{L}(r)$ curve for large-diameter *A. concolor* from 13–38 m provided further evidence for spatial aggregation at larger scales. The $\hat{L}(r)$ curves for large-diameter *C. decurrens* stems rose steadily from 0–80 m, reaching the upper bound of the simulation envelope at 30 m, indicating moderate but consistent clustering across these scales.

The relative spatial patterns of large- and small-diameter trees differed for all species combined, as well as for *P. lambertiana* and *A. concolor*, but not for *C. decurrens*. Small-diameter *P. lambertiana* were always more aggregated than large conspecifics at the same scale. Large-diameter *A. concolor* were less aggregated than conspecific small-diameter trees at scales of 0–3 m, then rapidly became more aggregated than small trees from 3–6 m, and remained so up to 80 m (Fig. 4). The spatial pattern of large and small *C. decurrens* subpopulations was similar from 0–80 m (Fig. 4).

We found evidence for negative associations between large-diameter and small-diameter *P. lambertiana* and *A. concolor*, and for all tree species combined, relative to the population independence hypothesis when evaluated from 0–9 m (Monte Carlo goodness-of-fit tests; *A. concolor*: $P = 0.001$; *P. lambertiana*: $P = 0.001$; all trees: $P = 0.001$). Spatial locations of large-diameter and small-diameter *C. decurrens* were independent at the 9 m neighborhood scale (Monte Carlo goodness-of-fit test; $P = 0.378$). The $\hat{L}_{1,2}(r)$ curve for *P. lambertiana* (Fig. 5) indicates spatial repulsion between large and small from 0–10 m, and modest attraction from 10–40 m. The $\hat{L}_{1,2}(r)$ curve for *A. concolor* decreased steadily from 0–80 m, but was only outside the simulation envelope at scales less than 10 m. Large and small stems of *C. decurrens* were spatially attracted from 15–80 m, with the empirical $\hat{L}_{1,2}(r)$ curve at or beyond the upper boundary of the simulation envelope (Fig. 5).

Discussion

The relative proportion of large trees varies in old-growth forests worldwide [28], and at 49.4%, the contribution that large-diameter trees make to the total biomass of the YFDP is higher than in most other forests. Although some forests have almost all of their biomass concentrated in large-diameter trees (most notably *Sequoia sempervirens*; [13,36]), the biomass of most forest types is concentrated in trees <100 cm dbh. In a 1 ha plot in tropical moist forests of Rondônia, Brazil, Brown et al. [1] found that three trees ≥100 cm dbh had biomass of 64.3 Mg compared to a total aboveground biomass of 285 Mg (22.6%). In 5.15 ha of neotropical lowland rain forest in Costa Rica, Clark & Clark [2] found that trees ≥70 cm dbh comprised 27% of the biomass of 241 Mg/ha (~18% for trees ≥100 cm dbh; [2], Fig. 1). In semi-evergreen forests of northeast India, Baishya et al. [37] found ~12% of biomass in trees ≥100 cm dbh, and plantation forests or forests that are recovering from disturbance may have few or no large-diameter trees, even when stem density and diversity are high [37,38].

Within the Smithsonian Center for Tropical Forest Science network (http://www.ctfs.si.edu/plots/), only the *Gilbertiodendron dewevrei* (mbau) forest of the Congo has a higher live biomass, with the dipterocarp forests of Malaysia having equivalent live biomass (Table 4, [39,40]). Other old-growth forest types have a biomass of ~60% of the YFDP [39]. When the live and dead biomass are considered together, the biomass of the YFDP is 652.0 Mg/ha, currently the highest in the CTFS network. Unlike either of the high-biomass tropical plots, live biomass in the YFDP is dominated by two tree species (both Pinaceae), *Pinus lambertiana* (50.4% biomass) and *Abies concolor* (42.6% biomass), while down woody debris biomass is similarly dominated by these two species (57% and 32%, respectively). Scaling theory did not describe the distribution of biomass in this system (Fig. 2). Differences between theory and this forest are likely driven by the reoccurrence of fire throughout the period of stand development, and because of mortality rates that vary with diameter class. However, the very high levels of heterogeneity in density and biomass at 20 m scales (Fig. 1) would make scaling theory even less informative in study areas smaller than the YFDP.

Although the YFDP has high biomass, the diversity of woody plants ≥1 cm dbh is the lowest among the CTFS plots ≥25 ha. The combination of summer drought and winter snow may reduce the species pool. Other temperate plots (Changbaishan, Wabikon, and the Smithsonian Ecological Research Center, SERC) have higher species diversity [41,42]. However, those plots either receive precipitation evenly distributed throughout the year (Wabikon and SERC), or the wet season coincides with the growing season (Changbaishan).

One almost ubiquitous difficulty in biomass analyses of large-diameter trees is the uncertainty of allometric equations. The use of previously published equations to predict biomass of large trees from ground-level measurement of DBH assumes that these equations were based on adequate sampling of large trees. However, most allometric equations for tree biomass have been developed from dissection of 10–50 trees [43], and the number of large trees used in formulating equations is very low. Some of the large-diameter *P. lambertiana*, *A. concolor*, and *C. decurrens* exceeded the maximum diameter of any that have been dissected, and for these individual trees, substitute species were used [see Appendix S1]. Moreover, DBH is often a poor predictor of whole-tree biomass as large tree DBH is a poor reflection of tree size [10]. Nonetheless, many comparative studies of primary forest biomass use allometric equations that probably predict large-diameter tree

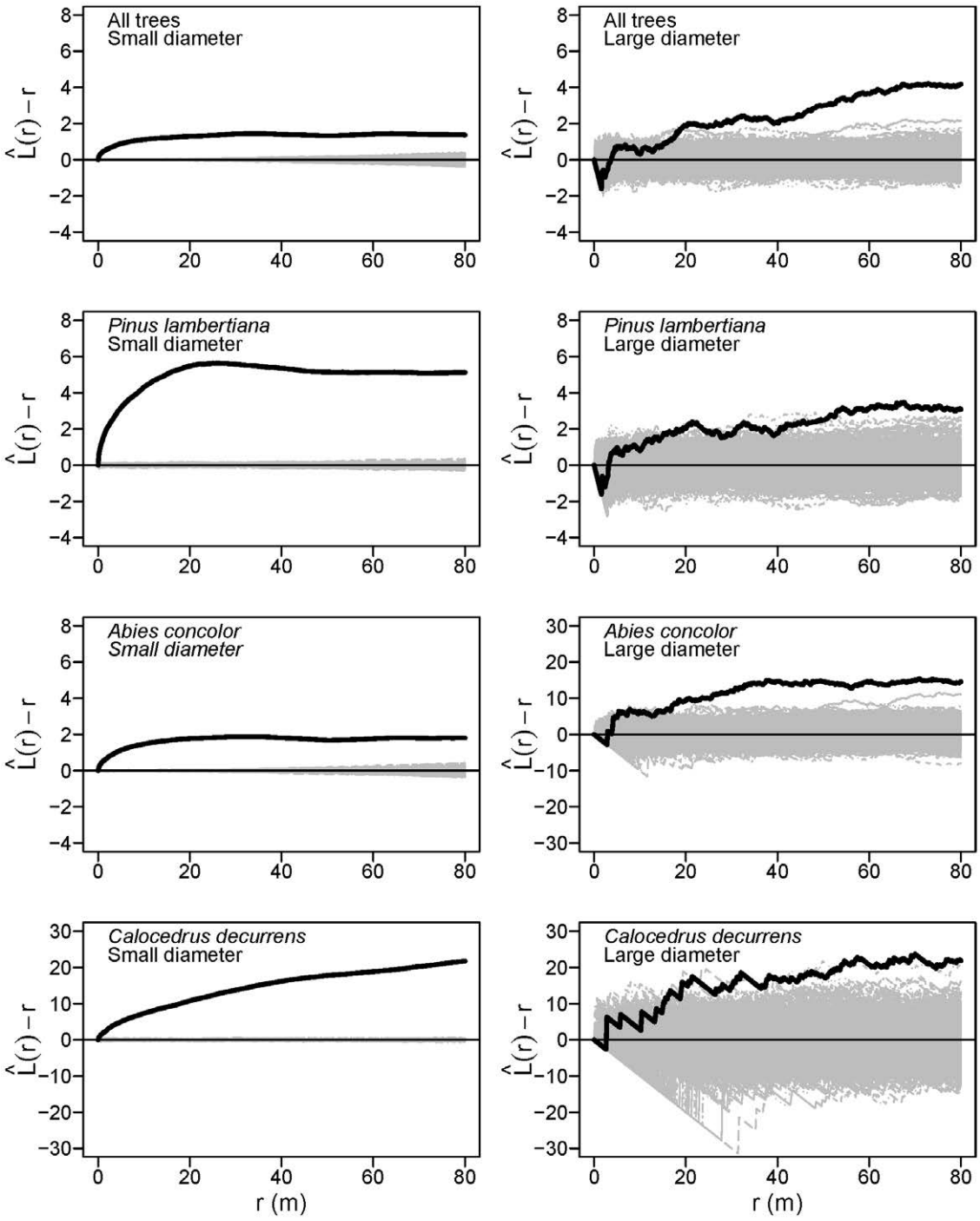

Figure 4. Univariate tree spatial patterns in the Yosemite Forest Dynamics Plot. Solid black lines show the $\hat{L}(r)$ statistic for the actual patterns, where r is the intertree distance; thin gray lines show $\hat{L}(r)$ curves for 999 simulations of complete spatial randomness. Positive values indicate spatial clumping and negative values indicate spatial regularity. Large-diameter trees are ≥100 cm dbh; small-diameter trees are <100 cm dbh.
doi:10.1371/journal.pone.0036131.g004

biomass poorly (i.e. [39,40]). Our calculations (Table 3) have been presented to a level of 1 kg/ha to enable comparison of forest dominants with less common and smaller tree species and likely represent an underestimation of whole tree biomass. However, the SD of biomass for principal species in the YFDP is 17% to 32% of the calculated value (Table 3), so the uncertainty of the large-diameter biomass could be larger than the smaller biomass pools. Biomass calculations for shrubs, snags, and woody debris also embody several simplifying assumptions (i.e. uniform stem density per unit area, single measures of diameter, simple geometry, no hollows in snags) that could lead to imprecise biomass totals.

Unlike the tropical forests where decomposition of snags and woody debris is rapid, the YFDP features considerable biomass of standing and down woody debris, also a characteristic of

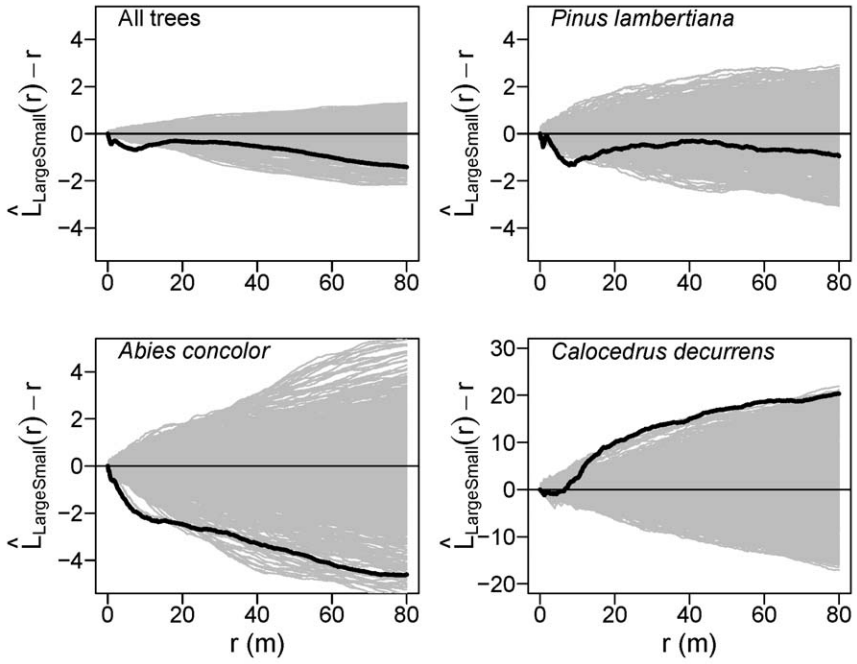

Figure 5. Spatial interactions between large-diameter and small-diameter trees. Solid black lines show the $\hat{L}_{1,2}(r)$ statistic for the actual pattern, where *r* is the intertree distance; thin gray lines show $\hat{L}(r)$ curves for 999 patterns simulated by synchronous random torodial shifts of large and small tree subpopulations. Positive values indicate spatial attraction and negative values indicate spatial repulsion. Large-diameter trees are ≥100 cm dbh; small-diameter trees are <100 cm dbh.
doi:10.1371/journal.pone.0036131.g005

temperate broadleaf forests [44]. The combination of snowy winters and dry summers contributes to slow decomposition, and even the fastest decomposing tree species (*A. concolor*) has a half-life of 14 years [14]. Large-diameter snags account for a relatively high proportion of total snag biomass, while large-diameter down woody debris accounted for a lower proportion of the woody debris. This may be due to low-severity fires in the historical period that might have consumed large-diameter woody debris via glowing combustion, decreasing the proportion relative to snag representation [45], or because small snags tend to fall over relatively quickly, thus being better represented in the woody debris pool. The lack of spatial correlation of the woody debris at any scale suggests that, while mortality may be non-random, tree and snag-fall events may result in loss of spatial pattern between standing individuals and the patterns of down wood they produce.

The observed univariate spatial patterns of large and small trees provide modest support for the inference that past competition contributed to the present spatial distribution of large-diameter trees. In particular, the increasing spatial uniformity from small to large size classes is consistent with competition theory [30,31]. However, the observed random arrangement of large trees at neighborhood scales differs from spatial uniformity expected when competition is the dominant process affecting tree spatial patterns. Previous studies of large-diameter tree spatial patterns in Sierra Nevada mixed-conifer forests agree with our findings (N.B., with large-diameter thresholds differing somewhat from 100 cm). Van Pelt and Franklin [32] found that main canopy trees at Giant Forest in Sequoia National Park were not different from spatial randomness at scales <9 m. In addition, their empirical $\hat{L}(r)$ curve [32] was similar to those for *P. lambertiana* and *A. concolor* in the YFDP: inhibited from 0–1.5 m. The observed small-scale (0–3 m) inhibition is most likely due to physical requirements for minimum hard core spacing due to the large size of the boles and limits to crown plasticity, although resource competition may

Table 4. Comparison of the Yosemite Forest Dynamics Plot with other Smithsonian CTFS-affiliated forest plots.

Location	Latitude	Forest type	Live biomass (Mg/ha)	Live and dead biomass (Mg/ha)	Woody species	Citation
Changbaishan, China	42.2°N	Korean pine mixed forest	318.9		52	Hao et al. [41]
Yosemite, USA	37.8°N	Mixed-conifer forest	507.9	652.0	23	This study
BCI, Panama	9.2°N	Lowland tropical moist forest	306.5		299	Chave et al. [39]
Lambir, Malaysia	4.2°N	Mixed dipterocarp forest	497.2		1,182	Chave et al. [39]
Lenda, Congo	1.3°N	Mbau forest	549.7		423	Makena et al. [40]

Live biomass includes woody stems ≥1 cm dbh. Live and dead biomass includes snags ≥10 cm dbh and forest floor components as well as live biomass (also see [38] for basal area comparisons among additional large forest plots.
doi:10.1371/journal.pone.0036131.t004

contribute as well. At Teakettle Experimental Forest (an old-growth, mixed-conifer forest 100 km south of the YFDP), stems ≥76 cm dbh were randomly arranged from 0–60 m [46]. However, Bonnicksen and Stone [47] found that main canopy *P. lambertiana* and *A. concolor* trees were uniformly spaced in a giant sequoia mixed-conifer forest in Kings Canyon National Park. Past competition and competitive mortality undoubtedly influenced the development of spatial patterning in large-diameter tree populations in some Sierra Nevada mixed-conifer forests [48,49]. However, it appears that the cumulative effects of any past self-thinning in the YFDP were not sufficient to completely override the effects of clustered or random tree regeneration [50], non-random mortality or other potential sources of heterogeneity in the distribution of large-diameter trees.

We must thus consider processes other than competition to explain spatial patterns of large-diameter trees in the YFDP. For the fire-tolerant and modestly shade-tolerant *P. lambertiana*, meso-scale aggregation (2–22 m) in the large-diameter subpopulation is most readily explained by clustered establishment, consistent with a disturbance-centric model of forest dynamics and spatial pattern formation in low and mixed severity fire regimes [51]. For *A. concolor* (fire intolerant when small) the strong clustering of large-diameter trees at local (3–5.5 m) and intermediate (13–38 m) scales may originate from fire refugia that allowed groups of *A. concolor* to survive and reach large diameters. Clustered establishment alone (e.g., in gaps or in moisture-receiving microtopographic features) could explain the aggregation of large *A. concolor* stems, but given the historical regime of frequent fire [51] it is likely that heterogeneous fire effects leading to patchy *A. concolor* survival also contributed.

The observed spatial segregation of large and small trees is consistent with inference that competitive interactions between these size classes influence their spatial relationships and overall forest structure. Spatial segregation of large and small trees has been documented in many other forest types (i.e. [33] and the studies reviewed therein), including Sierra Nevada mixed-conifer forests [32]. Spatial segregation between large and small trees may arise from asymmetrical competition for light and gap-phase regeneration [33]. However, we acknowledge that other mechanisms acting at the tree neighborhood scale potentially contribute to the observed spatial segregation between large and small *A. concolor* and *P. lambertiana*, including crushing mortality by falling limbs and bole fragments from live large-diameter trees [8,52], and the spatially heterogeneous buildup and subsequent burning of surface fuels. Additionally, in the absence of fire large-diameter *P. lambertiana* accumulate a deep mound of debris (bark and needles) at their base [53], a substrate not suitable for seedling establishment, which would also give rise to repulsion between large and small stems. Prior to fire exclusion, Sierra Nevada mixed-conifer forests had low densities of small-diameter trees [35,51]; the observed repulsion between tree diameter classes may also be due to preferential tree establishment in fire-maintained openings following disruption of the historical fire regime [54].

Conclusions

We assessed the degree to which scaling theory and competition theory explain variation of accumulated biomass and spatial patterns across the tree size spectrum. These respective bodies of theory were not sufficient to explain our empirical results. However, our results do not indicate the rejection of these theories. Scaling theory is clearly a powerful framework for developing novel ecological insights, but our results and those of others [21,27,28] show that the requisite simplifying assumptions render predictions from scaling theory inappropriate as inputs in to ecosystem models or as a basis for natural resource decision making. A vast body of accumulated scientific literature details mechanisms and outcomes of plant competition; our results do not contradict this theory. Rather, competition theory alone was insufficient to explain our empirical measurements of tree spatial patterns, strengthening the conclusion that competition is not the dominant control of tree population dynamics and forest development in old-growth Sierra Nevada mixed-conifer forests [24].

We predict that long-term observations at our study site and other sites throughout the range of Sierra Nevada mixed-conifer forests will reveal strong top-down regulation of forest biomass and spatial structure by pathogens, insects and physical disturbances, especially in old-growth forests. We also suggest that, in forests with high functional inequality across the tree size spectrum, ecosystem function may be more sensitive to natural perturbations, environmental change or management actions – at least those affecting the large-diameter trees – than in forests where ecosystem function is distributed more equitably across the tree size spectrum. Sustaining ecological functions and services, such as carbon storage or provision of habitat for specialist species, will likely require different forest management strategies when the ecosystem services are provided primarily by a few large trees as opposed to many smaller trees.

Materials and Methods

Study area

The Yosemite Forest Dynamics Plot (YFDP) is located in the mixed-conifer forest of the western portion of Yosemite National Park (Fig. 6). The plot is approximately oriented to the cardinal directions with dimensions of 800 m east to west and 320 m north to south (25.6 ha) centered at 37.77°N, 119.82°W. Elevation ranges between 1774.1 m and 1911.3 m for a vertical relief of 137.2 m (Fig. S1). The YFDP is comprised of vegetation types within the *Abies concolor – Pinus lambertiana* Forest Alliance [55], including *Abies concolor-Pinus lambertiana/Ceanothus cordulatus* Forest, *Abies concolor-Pinus lambertiana/Maianthemum racemosum* (*Smilacina racemosa*, Hickman [56])-*Disporum hookeri* Forest, *Abies concolor-Calocedrus decurrens-Pinus lambertiana/Cornus nuttallii/Corylus cornuta* var. *californica* Forest, *Abies concolor-Calocedrus decurrens-Pinus lambertiana/Adenocaulon bicolor* Forest, and *Abies concolor-Pinus lambertiana-Calocedrus decurrens/Chrysolepis sempervirens* Forest, classified according to the U.S. National Vegetation Classification [57](Fig. 7). Overall demographic rates in Sierra Nevada conifer forests between 1500 m and 2000 m elevation are approximately 1.5% [58,59]. Canopy emergents, principally *P. lambertiana* and *A. concolor*, reach 60 m to 67 m in height. The soils of the YFDP are derived from metamorphic parent material. Approximately 85% of the soils of the YFDP are metasedimentary soils of the Clarkslodge-Ultic Palexeralfs complex with a water-holding capacity of 160 mm in the top 150 cm of the soil profile [60]. The soils of the northwest 15% of the YFDP are Humic Dystroxerepts-Typic Haploxerults-Inceptic soils of the Haploxeralfs complex with a water-holding capacity of 70 mm in the top 150 cm of the soil profile [60]. Plant nomenclature follows Hickman [56].

The climate at the YFDP is Mediterranean, with cool moist winters and long dry summers. Between 1971 and 2000, the modeled mean temperature range at the YFDP was from 12.2°C to 26.1°C in July and −2.7°C to 9.4°C in February; annual precipitation was 1061 mm, with most precipitation falling in the winter months as snow [61,62]. Snow depth on April 1st is generally 100 cm to 150 cm. The seasonality of precipitation

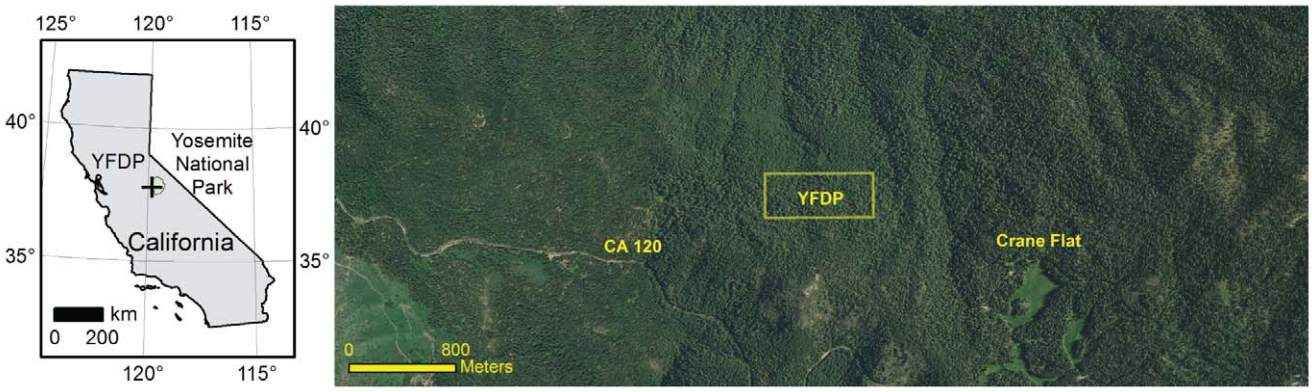

Figure 6. Location of the Yosemite Forest Dynamics Plot (YFDP). The YFDP is located near the western boundary of Yosemite National Park (left, green) in the lower montane, mixed-conifer zone of the Sierra Nevada, California, USA. The plot is located in relatively uniform, late-successional forest near Crane Flat (right). The area immediately north of the YFDP was logged in the early 1930s, as was the area comprising the western 1/3 of the image.
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yields a summer drought with a mean annual climatic water deficit of 200 mm [63] (Fig. S2).

Disturbance processes: fire, wind, insects, pathogens, vertebrates, and human use

Fire is the dominant natural disturbance process in Sierra Nevada mixed-conifer forests [64]. The fire regime is of mixed severity with fires burning in a mosaic of high, moderate, and low severities. The pre-Euro-American fire return interval for the YFDP was 10–13 years [51]. The combination of repeated fire and other disturbances gives rise to a fine-grained mosaic structure [50,65]. During the Landsat TM period of record (1984–2011), most fires in this forest type have been either low severity management-ignited prescribed fires or moderate and high severity wildfires [66–68]. The YFDP has not burned since comprehensive park fire records were initiated in 1930. Mechan-

Figure 7. Structure and composition of the Yosemite Forest Dynamics Plot (YFDP). Four images from different parts of the YFDP illustrate defining characteristics of the ecosystem. Most precipitation falls in the winter as snow yielding a spring snowpack of approximately 1 m (upper left image, April 11, 2011). The forest is composed of an overstory of large-diameter trees with abundant but heterogeneous shrub and herbaceous layers (upper right image, June 22, 2009). Shrubs can be locally dense enough to reduce tree recruitment (lower left image, June 22, 2009). Although most trees and shrubs are evergreen, the presence of the deciduous species *Cornus nuttallii* and *Quercus kelloggii* results in seasonal openings in the canopy (lower right image, November 11, 2010). All photos by J. A. Lutz.
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ical damage, whether from wind, snow, or crushing of smaller individuals by falling trees or tree parts contributes to stand structural development [8,69]. Many of the larger trees in the YFDP have broken tops, or reiterated tops that have regrown following damage.

Insects are important agents of mortality, with most common conifer tree species having coevolved bark beetles (family Scolytidae) that are always present at low levels [70,71]. In particular, *Dendroctonous ponderosa* (mountain pine beetle) attacks *Pinus lambertiana* and *P. ponderosa* and *Scolytus ventralis* attacks *Abies concolor* and *A. magnifica*. Other bark beetles such as *S. subscaber*, *D. valens* (red turpentine beetle) and *Ips* spp. have been less abundant in the recent past but contribute to tree mortality. *Quercus kelloggii* (California black oak) also has associated bark beetles (*Pseudopityophthorus* spp.). *Conophthorus ponderosae* (ponderosa pine cone beetle) is present and can reduce the reproductive output of *P. lambertiana*.

Pathogens include the structural root rots *Armillaria* spp. [72], *Heterobasidion annosum* [73] and *Phaeolus schweinitzii* [71]. The root rots spread through roots and root contacts at rates of approximately 30 cm per year, and hence tend to occur in patches. *Armillaria* spp. are somewhat generalist pathogens and attack *Abies* spp., *Prunus* spp., and *Cornus nuttallii*. *Phaeolus schweinitzii* infects *Pinus lambertiana* and *Abies* spp., but tends to progress much more slowly than *Heterobasidion* and *Armillaria*. *Pinus lambertiana* is also affected by the introduced pathogen *Cronartium ribicola* [74]. *Calocedrus decurrens*, *Abies concolor*, and *Quercus kelloggii* are hosts to mistletoes: *Phoradendron libocedri* on *C. decurrens*, *Phoradendron pauciflorum* and *Arceuthobium abietinum* on *A. concolor*, and *Phoradendron villosum* on *Q. kelloggii* [75]. These mistletoes are distributed both by birds, and in the case of *Arceuthobium abietinum*, also by explosive discharge that can carry seeds up to 16 m (typically 10 m; [75]).

The YFDP has a rich fauna, with most species of herbivores and their predators present since prior to Euro-American settlement. Large mammals include *Ursus americanus* (black bear), *Felis concolor* (mountain lion), *Canis latrans* (coyote), and *Odocoileus hemionus* (mule deer). Altogether, vertebrate species observed within similar forest types within 5 km of the YFDP include 16 rodent species, 12 bat species, 7 carnivore species, one hooved mammal, 7 raptor species, 38 passerine species, 5 amphibian species, and 7 reptile species Table S1, [76–79]).

Yosemite has been inhabited at least since 100 AD [80]. Immediately prior to Euro-American discovery of the region in 1833 [81] and the subsequent entry of Euro-Americans into Yosemite Valley in 1851 [82], the area was occupied by the Central Sierra Miwok and the Southern Sierra Miwok [83]. Because the YFDP contains only intermittent streams and seeps, Native American use of the site was probably low, and modification of the fire regime at this site by Native Americans appears unlikely [84]. The YFDP is near the transit route from Hazel Green to Crane Flat used by sheepherders in the late 19th century. John Muir may have passed through or near the YFDP on July 9th, 1869 – the topography and vegetation are consistent with his journal entry [85].

The original Yosemite Grant (1864) placed Yosemite Valley and the Mariposa Grove of giant sequoia in protected status. The YFDP lies within what was a single parcel of land prior to its inclusion into Yosemite National Park in 1930. The parcel of land immediately to the north of the YFDP (~20 m from the plot boundary) was in different ownership and was logged in the early 1930s. The northwest corner of the YFDP contains four large stumps that appear to be associated with the logging of the parcel to the north. Logging outside the YFDP continued throughout the 1920s until the area was purchased by the National Park Service and John D. Rockefeller. The area of unlogged sugar pine containing the YFDP is today termed the Rockefeller Grove in honor of J.D. Rockefeller's role in protecting this part of the park.

Surveying

We established a sampling grid using Total Stations with accuracies of at least 5 seconds of arc (Leica models 1100, Builder R200M Power, Builder 505, and TC 2003). We set permanent markers on nominal 20 m centers, offset for tree boles, coarse woody debris, or large rocks. Survey closure across the plot was 0.18 m northing, 0.05 m easting, and 0.03 m elevation (~1/5000). In addition to the sampling grid, we established control points in open areas near the plot where marginal Global Positioning System (GPS) reception was possible. Three survey-grade GPS receivers (Magellan Z-Extremes) were used to establish control to and across the plot, using a reference station approximately 2 km from the plot (MGROVE, PID DF8617 on the California State Plane Coordinate System and being described in the National Geodetic Survey Datasheets). The GPS receivers collected data at 10 second intervals for 2–6 hours. The static GPS measurements were post-processed with GNSS Solutions software (Magellan Navigation, Inc., pro.magellangps.com), with final accuracies in the range of 0.01 m horizontally and 0.02 m vertically. We transformed the plot grid to Universal Transverse Mercator coordinates with Lewis and Lewis Coordinated Geometry software (Lewis and Lewis Land Surveying Equipment, Inc., www.lewis-lewis.net). We augmented the ground survey with LiDAR-derived elevation data at 1 m horizontal resolution. Aerial LiDAR data were acquired on 22 July 2010 by Watershed Sciences Inc., Corvallis, Oregon with a density of 40 returns per square meter. Ground survey data and the LiDAR-derived ground model coincided with a root-mean-squared error of 0.15 m.

Field sampling of trees, shrubs, snags, and woody debris

In the summers of 2009 and 2010 we tagged and mapped all live trees ≥1 cm at breast height (1.37 m; dbh), following the methods of Condit [86], with some alterations. We measured tree diameter at 1.37 m (instead of 1.30 m), and trees large enough to accept a nail were nailed at the point of measurement, both in keeping with research methods of the western United States. We used stainless steel tags, nails and wire to increase tag longevity in this fire-dominated ecosystem. We measured tree locations from the surveyed grid points with a combination of hand-held lasers (Laser Technologies Impulse 200 LR), mirror compasses, and tapes. Tapes were laid south to north between adjacent grid points, and a perpendicular angle determined by sighting a target bole with a mirror compass. The distance from the tape to each tree was then measured with the hand-held lasers. We calculated the location of the tree center from the horizontal and perpendicular references to the surveyed grid points and dbh with the assumptions of cylindrical boles and linear interpolation of elevation between adjacent grid points. All measurements were slope corrected.

We mapped continuous patches of shrub cover ≥2 m^2 relative to the 20 m sampling grid with a combination of tapes, mirror compasses, and lasers. For each shrub patch we recorded the shape of the patch as a polygon, as well as average and maximum shrub heights. To convert between shrub cover and the number of stems and biomass in the YFDP, we established 25 shrub demography plots for nine species (*Arctostaphylos patula*, *Ceanothus cordulatus*, *Ceanothus integerrimus*, *Ceanothus parvifolius*, *Chrysolepis sempervirens*, *Corylus cornuta* var. *californica*, *Cornus sericia*, *Leucothoe davisiae*, and *Vaccinium uliginosum*). We tagged every woody stem in each of these 2 m×2 m plots. We measured basal diameter for

every woody stem. If stems were 1.37 m tall (or long), we made an additional measurement at 1.37 m.

We tagged and mapped dead trees ≥10 cm dbh and ≥1.8 m in height. For each snag, we collected height, top diameter (with a laser), and snag decomposition class data (following [87]; class 1 = least decayed, class 5 = most decayed). We did not collect data on trees <10 cm dbh at the original census because of the difficulty in finding small stems a few years after they die.

To measure down woody debris, litter, and duff, we established four interior fuel transects totaling 2.24 km (112 transects of 20 m). We used the National Park Service fuel monitoring protocols [88], in turn based on Brown transects [89]. Litter included freshly fallen leaves, needles, bark, flakes, acorns, cones, cone scales, and miscellaneous vegetative parts [88]. Duff included the fermentation and humus layers, not the fresh material of the litter layer. Down woody material included branches, trunks of trees, and shrubs that had fallen on or within 2 m above the ground [88]. Intercept diameter and decay class were recorded for all intercepted woody debris ≥10 cm in intercept diameter (measured perpendicular to the orientation of the piece of debris). To sample fine woody debris we used portions of the 112 line intercept transects −2 m for material 0 cm–2.5 cm in diameter (1-hour and 10-hour fuels), and 4 m for material 2.5 cm–7.6 cm (100-hour fuels). We calculated biomass according to Brown's method [89].

Biomass calculations

We reviewed all allometric equations from the two compendia of equations for North America [43,90] and selected those that best matched the species, geographic location, diameter ranges, and tree densities of the YFDP [44,90–93]. Where no allometric equation existed, we substituted a species (or diameter class within a species) that was a close match for morphology and wood density (see Appendix S1 for details). Because no whole tree biomass equations exist for the largest individuals of the species in the YFDP, we used proxy species. For the largest *Abies concolor* (n = 112) we used bole equations for *A. procera*. For *Pinus lambertiana*, we used branch and foliage equations for *Pseudotsuga menziesii*, and for the *Pinus lambertiana* >179.6 cm dbh (n = 7), we used a bole equation for *Pseudotsuga menziesii*. Additionally, no biomass equations exist for branches and foliage of *Abies* >110 cm dbh or *Pseudotsuga* >162 cm dbh. For those trees we capped the branch and foliage biomass at the values associated with trees of diameter 110 cm and 162 cm, respectively. All biomass calculations were made within the data ranges of the selected allometric equations (See Appendix S1 for full details of allometric equations). We calculated an error term for tree biomass from the underlying allometric equations. The root mean square error (standard error of estimate) of the allometric equations was transformed from log units to arithmetic units of standard deviation (i.e. Mg/ha) [92]. We defined large diameter structures as pieces ≥100 cm in diameter to facilitate comparisons with earlier studies of large-diameter trees in old-growth conifer forests on the Pacific Slope of western North America.

We calculated the biomass of the stems within each 4 m^2 shrub demography plot based on allometric equations using basal diameter [90]. We used the biomass of the stems within the demography plots and the total area of shrub patches ≥2 m^2 within the YFDP to calculate total shrub biomass. We used the demography plot data for sampled species as proxies for the four species without demography plots (*Corylus cornuta* var. *californica* for *Sambucus racemosa*, *Vaccinium uliginosum* for *Rhododendron occidentale* and *Ribes nevadense*, and one-half the value of *Vaccinium uliginosum* for *Ribes roezlii*). To calculate a stem density equivalent to the standard Smithsonian CTFS protocol [86], we tallied the number of stems that were ≥1 cm dbh in each shrub demography plot and multiplied by the area of each shrub patch ≥2 m^2. Details of allometric equations are in Appendix S1.

We calculated snag biomass using the wood density values of Harmon et al. [15] and a bole volume calculated as a frustum of a cone. We calculated the biomass of litter and duff using the methods of Stephens et al. [94]. For down woody debris larger than 1000-hour fuels (4 inches; ~10 cm), we used the large transect protocols of Harmon et al. [15], and we calculated the mass of woody debris using the methods of Harmon and Sexton [87].

To compare actual density and biomass values with the predictions of scaling theory, we used the equations from West et al. [26]. Specifically, we compared the actual diameter (radius) distribution with their predicted distribution, $(r) \propto \frac{1}{r^2}$, where r is tree radius at breast height. We then reconfigured their radius-mass relationship, $r \propto m^{3/8}$, to $m \propto r^{8/3}$, where r is tree radius and m is tree biomass, and combined the mass and frequency equations to develop a relationship for total biomass in terms of tree radius: $(m \propto r^{8/3})(n \propto r^{-2})$ or $biomass \propto r^{2/3}$. We used 5 cm diameter bins (2.5 cm radius bins) to regress curves of these forms to the data.

Quantifying spatial pattern

We quantified global spatial patterns with the univariate and bivariate forms of Ripley's K function, using the square root (L function) transformation in all cases. For a given fully mapped pattern, an estimate of the $L(r)$ function, the statistic $\hat{L}(r)$, is based on the count of neighboring points occurring within a circle of radius r centered on the ith point, summed over all points in the pattern [95,96]. The bivariate form $\hat{L}_{1,2}(r)$ is a straightforward extension of the univariate case: it is the count of type 2 points occurring within a circle of radius r of the ith type 1 point, summed over all type 1 points in the pattern. We characterized patterns at interpoint distances from 0 m to 80 m (one quarter the minimum plot dimension) and used isotropic edge correction to account for points located closer than r to a plot edge [96]. Our study area included enough large-diameter trees to analyze spatial patterns of three tree species: *Abies concolor*, *Calocedrus decurrens* and *Pinus lambertiana*.

Inferential framework for spatial analyses

Univariate tree patterns were compared against a null distribution generated by a completely spatially random (CSR) process. Under CSR the location of each point in the pattern is completely independent of the locations of other points in the pattern. Positive values of $\hat{L}(r)$ indicate spatial clustering (trees have more neighbors than expected under CSR) while negative values of $\hat{L}(r)$ indicate spatial inhibition or uniformity (trees have fewer neighbors than expected under CSR).

Bivariate tree patterns were evaluated against the hypothesis of no interaction between the large-diameter and small-diameter subpopulations. We evaluated this hypothesis using the null model of population independence based on the guidelines of Goreaud & Pélissier [97]. Population independence is evaluated by holding the relative intratype spatial configuration constant (i.e., the relative tree locations within a diameter class are fixed) while subjecting the populations to random toroidal shifts. Under population independence significantly positive values of $\hat{L}_{1,2}(r)$ indicate a spatial attraction between the two types (e.g., originating from a parent-offspring relationship or facilitation) while significantly negative values indicate spatial repulsion between the two

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types (e.g., Janzen-Connell effects or intraspecific competition). Large-diameter trees were ≥100 cm dbh; small-diameter trees were <100 cm dbh.

We used the 9 m radius neighborhood size estimated by Das et al. [24,98] for Sierra Nevada mixed-conifer forests and tested the respective empirical patterns against the corresponding null models over 0 m≤r≤9 m using the goodness-of-fit test developed by Loosmore and Ford [99]. We set $\alpha = 0.05$ and used $n = 999$ simulated patterns in each test ($n = 250$ simulated patterns were used for univariate analyses of small-diameter *A. concolor* and all species pooled, respectively, to mitigate excessively long computation times). To control for multiple tests ($n = 12$) we used the Bonferroni correction, resulting in a threshold P-value of 0.004. Because we had no *a priori* hypotheses about tree patterns at spatial scales >9 m we investigated patterns at larger scales in an exploratory framework by comparing the empirical $\hat{L}(r)$ curves to the full distribution of $\hat{L}(r)$ curves calculated for the simulated patterns. All analyses were implemented in the statistical program R version 2.14.1 [100]. Spatial analyses were conducted using the spatstat package version 1.25-1 [101].

Supporting Information

Figure S1 Topography of the Yosemite Forest Dynamics Plot. LiDAR-derived ground model at 1 m resolution (5 m contours; 137.2 m vertical relief). Dots indicate corners of each 20 m×20 m quadrat of the 800 m×320 m plot. Elevation ranges from 1774.1 m in the northeast corner to 1911.3 m along the southern boundary for a vertical relief of 137.2 m. Drainages contain vernal streams.
(TIF)

Figure S2 Climatology and water balance of the Yosemite Forest Dynamics Plot. The combination of temperature and precipitation (A) give rise to a pronounced summer drought (B). Potential evapotranspiration (PET) exceeds available water supply from May through September, decreasing actual evapotranspiration (AET) and producing a climatic water deficit (Deficit) of 197 mm of water.
(TIF)

Table S1 Vertebrate species reported in similar forest types within 5 km of the Yosemite Forest Dynamics Plot between 1980 and 2011.
(PDF)

Appendix S1 Allometric equations for total aboveground biomass for trees ≥1 cm dbh and shrubs in patches of continuous cover ≥2 m^2 in the Yosemite Forest Dynamics Plot.
(PDF)

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Author Contributions

Conceived and designed the experiments: JAL AJL MES JAF. Performed the experiments: JAL AJL MES JAF. Analyzed the data: JAL AJL MES JAF. Wrote the paper: JAL AJL MES.

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EXHIBIT E

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Project Title: Optimizing Spatial and Temporal Treatments to Maintain Effective Fire and Non-fire Fuels Treatments at Landscape Scales

Final Report: JFSP Project: 06-3-3-14

Project Website:

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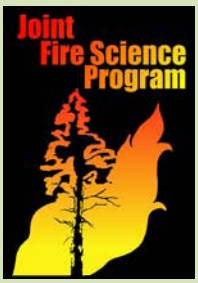

I. Abstract

There is a recognized need to apply and maintain fuel treatments to reduce catastrophic wildland fires. A number of models and decision support systems have been developed for addressing different aspects of fuel treatments while considering other important resource management issues and constraints. Although these models address diverse aspects of the fuel treatment-planning problem, no one model adequately handles the strategic maintenance scheduling of fuel treatments while considering 1) the spatial and temporal changes of fuel treatment effects on a landscape, and 2) the economics of maintenance fuel treatments plus other operational constraints.

The objective of this project was to integrate existing fire behavior, vegetation simulation, and land management planning tools into a system that supports long-term fuel management decisions. The system was to build on the existing land management optimization tool MAGIS, while incorporating the Forest Vegetation Simulator and the Fire and Fuels Extension (FVS-FFE) to project vegetation change over planning periods and predict the resulting fuel parameters for fire behavior modeling, and FlamMap to model fire behavior in each planning period. The system was to include automated data transfer interfaces between the models to offer an easier way to use multiple sophisticated models for analyzing alternative fuel management schedules.

The project developed OptFuels, a GIS-based modeling system for spatially scheduling forest fuel treatments over multiple planning periods in the presence of budget and other constraints. OptFuels utilizes FVS-FFE to project stands into the future both with and without fuel treatments and compute the fuel parameters needed for fire behavior modeling in FlamMap, which is conducted for each planning period in each iteration of the OptFuels solver. The OptFuels solver spatially schedules fuel treatments over multiple planning periods (1 – 5 user-defined periods) to minimize the expected loss from potential future wildland fire.

OptFuels has been tested on two fuel treatment planning areas on the Bitterroot National Forest, the 34,000-acre Trapper-Bunkhouse area, and the 103,689-acre Willow-Gird area. Fuel treatment scenarios scheduled over two planning periods were able to substantially reduce the fire arrival time in the wildland urban interface portion of the Trapper-Bunkhouse area, thereby reducing the expected loss from future fires. Smaller reductions in expected loss were found in the Willow-Gird area. Although increases in arrival time were created by the scheduled fuel treatments, these treatments did not increase the arrival times sufficiently in the areas on the landscape having the highest expected loss, such as the wildland urban interface. This occurred primarily because of the relatively close proximity of the ignition points in the wildland urban interface simulating human ignited fires.

II. Background and Purpose

There is a recognized need to apply and maintain fuel treatments to reduce catastrophic wildland fires. The Healthy Forests Restoration Act of 2003 mandates actions to identify and inventory priority areas. Treating all of the 81 million hectares of federal land in the USA considered at risk from fire (Schmidt et al. 2002) would be costly and impractical. Forest managers faced with limited budgets, narrow burning windows, air quality issues, and effects on other critical forest resources must establish priorities for where, when, and how to apply new and maintenance fuel

treatments. Science-based yet field applicable guidelines to strategically maintain fuel treatments on landscapes should be incorporated into treatment design to reduce catastrophic fire and restore ecosystem health over time. Therefore, decision support systems that can predict the outcomes of fuel treatments are valuable information tools for fuel management decisions. There is a need for the use of such models to be utilized at a national level.

A number of models and decision support systems have been developed for addressing different aspects of fuel treatments while considering other important resource management issues and constraints. These models operate on a variety of geographic scales, varying from an individual stand to an entire landscape comprised of many individual stands. Some models operate only on current conditions, while others span over multiple decades.

A. Fire behavior and fuel hazard modeling

The FARSITE Fire Area Simulator (Finney 1998) was designed to model continuous fire behavior over multiple burning periods at a 30-meter resolution. FARSITE is able to compare the effectiveness of different suppression strategies and treatments for containing fire under varying weather conditions. FARSITE evaluations are based on simulating fires starting at various locations and spreading under varying fuel and weather conditions. There is, however, no temporal component to these analyses that reflects how the effectiveness of treatments changes over time with vegetative growth.

FlamMap (http://fire.org/) is a spatial fire area potential calculator for assessing fuel hazard in terms of fire behavior. The purpose of FlamMap is to generate fire behavior data that are comparable across a landscape for a given set of weather and/or fuel moisture data inputs. The fire behavior models in FlamMap are used to make calculations for all cells of a raster landscape, independently of one another (there is no contagious process that accounts for fire movement across the landscape or among adjacent cells). FlamMap calculates the instantaneous behavior of a fire occurring at each pixel in the analysis area based on the same local weather inputs. In this way FlamMap compares potential fire behavior across a landscape by distinguishing different hazardous fuel and topographic combinations.

FlamMap contains an option called Minimum Travel Time (MTT) (Finney 2002) which is a fire growth simulator that uses minimum travel time methods to simulate how fast one fire or a band of multiple fires are expected to move across a landscape. It is used to identify the routes where fire is expected to travel most quickly. Like the main component of FlamMap, these simulations are based on the current fuels, specific locations for fire starts, and weather conditions. If one accepts that fuel treatments should be prioritized on the basis of juxtaposition of high values to hazardous fuels, this program begins to give us the ability to develop a biophysical definition of wildland urban interface based on the distance fire can travel under specified conditions. It does not include endogenous scheduling of treatments, and like the other fire behavior-based models, works only with the current fuels.

The Treatment Optimization Model (TOM) (Finney 2006) is another option on the FlamMap menu. It uses minimum travel time logic to determine effective locations for fuel treatments on a landscape. The treatment locations are based on the fire behavior expected from the current fuels present on the landscape, specific locations for fire starts, and weather conditions. The solutions suggest location, sizes, and orientations of fuel treatments that are efficient and effective at changing large fire growth by reducing the fire spread rate. The treatment locations are selected

to reduce the rates of fire spread across the landscape, and are not designed to protect specific locations on a landscape, such as designated wildland urban interface. Also, the placement of treatments does not consider feasibility factors associated with location or shape, nor do they address resource effects, or management limitations such as budget. Finally, there is no temporal aspect to TOM, so it cannot analyze alternative timings of fuel maintenance treatments on a landscape.

The Fire and Fuels Extension to the Forest Vegetation Simulator (FVS-FFE) evaluates the effectiveness of proposed fuel treatments in the context of potential fire effects on short- and long-term stand dynamics (Reinhardt and Crookston 2003). In contrast to other fire behavior fuel hazard models, the FVS-FFE has the ability to simulate the dynamics of vegetation, snags, and surface fuels, and the appropriate interactions between these processes at a stand level (Kurz and Beukema 1999). In combination with the Parallel Processing Extension (PPE; Crookston and Stage 1991) the FVS-FFE can be used to simulate the dynamics of landscapes containing several hundred to a few thousand stands. The FVS-FFE does not simulate fire spread between stands, but it has the ability to provide inputs to FARSITE and FlamMap (Hayes and others 2004).

Other fire models include 1) the First Order Fire Effects Model (FOFEM) which models duff and woody fuel consumption, mineral soil exposure, soil heating, smoke production, and tree mortality (Reinhardt and others 1997), 2) FIREHARM which can be used to calculate fire behavior and effects potentials for varying weather percentiles used in fire management planning, and 3) NEXUS (Scott and Reinhardt 2001) which is an Excel(tm) spreadsheet linking surface and crown fire prediction models. All these fire models, however, do not include treatment scheduling or address temporal aspects of fuels management.

B. Landscape simulation and treatment scheduling modeling

SIMPPLLE is a stochastic simulation model for projecting vegetation spatially in the presence of disturbances such as insects, disease, and wildland fire (Chew 1997, Chew and others 2004). Simulations can be made with or without fire suppression, with or without fuel treatments, and under average or extreme fire conditions. Spread logic is included for wildland fire and other disturbance processes. The location and frequencies of disturbance processes quantified from multiple stochastic simulations provide estimates of the location and probabilities of future disturbance processes. These provide a basis for identifying "problem areas," as well as estimating costs and effects associated with disturbances processes.

MAGIS is an optimization model for spatially scheduling treatments that effectively meet resource and management objectives while satisfying user-imposed resource and operational constraints (Zuuring and others 1995). MAGIS accommodates a wide variety of land management treatment types, and associated costs, revenues, and effects. MAGIS also contains a road-network component for analyzing road construction, re-construction, and closure. The combination of the land management and road-network components provides the capability to include the limitations (for example sediment production) and costs associated with vegetation treatments as well as access and roads in spatially analyzing maintenance of fuel treatments.

SIMPPLLE and MAGIS have been used in a process for spatially scheduling treatments and analyzing the effectiveness of those treatments (Jones and Chew 1999, Chew and others 2003, Jones and others 2004). In this process, SIMPPLLE is used first to run stochastic simulations for the "no action" management alternative. From these simulations the frequency of natural

disturbances is recorded for each polygon in the landscape, representing the risk of these natural processes occurring over a period of time. These risks are then incorporated into MAGIS and combined with resource and operational objectives and constraints to develop an alternative spatial treatment schedule. These treatments schedules are then simulated in SIMPPLLE and the results compared with the results of the "no action" simulations to measure the effectiveness of the fuel treatment scenario. Key questions, however, remain in the SIMPPLLE/MAGIS approach involving computation of the risk index and the treatment patterns resulting from it, among others.

A past Joint Fire Science project, A Risk-Based Comparison of Potential Fuel Treatment Trade-off Models, compared the SIMPPLLE/MAGIS approach with two non-spatial models FETM (CH2M Hill 1998) and VDDT (Beukema and Kurz 1998) on eight areas representative of major fuel types. The focus was on modeling fuel treatment trade-offs for use in strategic planning. The comparison found significant differences in how information is assembled and used in the models. SIMPPLLE and MAGIS were sensitive to the spatial arrangement of vegetation and treatments, making the data requirements somewhat more stringent, but they also provide as output the spatial arrangement of proposed treatments. Non-spatial solutions may not be either optimal or even operationally feasible.

C. The need for integrating types of models

Although these models address diverse aspects of the fuel treatment-planning problem, no one model adequately handles the strategic maintenance scheduling of fuel treatments while considering 1) the spatial and temporal changes of fuel treatment effects on a landscape, and 2) the economics of maintenance fuel treatments plus other operational constraints. For example, FARSITE and FlamMap are able to compute fire behavior characteristics at a landscape scale, but neither maintenance scheduling nor temporal effects of treatments are included in either model. FVS-FFE has the ability to model stand-level fuel and vegetation dynamics, but it does not simulate the spread of fires between stands. On the contrary, MAGIS has the ability to spatially schedule fire and non-fire maintenance treatments that effectively meet resource and management objectives, but no fire spread logic exists in the system. Fire managers have to use these multiple systems in order to analyze spatial and temporal effects of maintenance fuel treatments, but lack of time and resources to maintain and operate these sophisticated systems has been a hurdle. Consequently, there is a critical need to merge these systems into one easy-to-use decision support system that 1) facilitates automatic linkages among the existing models, 2) streamlines analyses for identifying where, when, and how to treat in order to achieve and maintain desired fuel reduction goals, and 3) bridges the fire sciences and management gap by incorporating given resource and operational constraints (e.g. budgets, treatment acres, and operational feasibility of treatments) into decision-making process.

D. Project objectives

The main objective of this project was to integrate existing fire behavior, vegetation simulation, and land management planning tools into a system that supports long-term fuel management decisions. The system was to build on the existing land management optimization tool MAGIS, while incorporating FVS-FFE to project vegetation change over planning periods and predict the resulting fuel parameters for fire behavior modeling, and FlamMap to model fire behavior in each planning period. The system was to include automated data transfer interfaces between the

models to offer an easier way to use multiple sophisticated models for analyzing alternative fuel management schedules. The system was to be validated on two landscapes.

III. Study Description and Location

This project developed OptFuels, a GIS-based modeling system for spatially scheduling forest fuel treatments over multiple planning periods in the presence of budget and other constraints. OptFuels utilizes the Forest Vegetation Simulator and the Fire and Fuels Extension (FVS-FFE) to project stands into the future both with and without fuel treatments and compute the fuel parameters needed for fire behavior modeling in FlamMap, which is conducted for each planning period in each iteration of the OptFuels solver. The OptFuels solver spatially schedules fuel treatments over multiple planning periods (1 – 5 user-defined periods) to minimize the expected loss from potential future wildland fire.

The main spatial component of an OptFuels model is a GIS stand polygon coverage. For simplicity, these stand polygons double as treatment unit polygons, thereby avoiding the necessity for a separate treatment unit polygon coverage at this stage in the planning process. Management regimes comprised of one or more treatment activities are assigned to the polygons based on user-specified rules that are tied to spatial zones and stand characteristics. Each management regime is comprised of a sequence of treatment activities that may extend over multiple planning periods to represent scheduled retreatment of the same location, or represent a one-time treatment occurring in a single planning period. Costs for activities are entered as table lookups, allowing costs to vary by conditions where appropriate, while at the same time accommodating a simple average treatment activity cost.

After the management regimes have been assigned to the polygons, OptFuels runs FVS-FFE to simulate the no action landscape. Then treatment options are assigned to the polygons based on the no action output and geographically defined management zones. These treatment options are then simulated with FVS-FFE for the sequence of treatments specified in the management regimes. In this process, FVS-FFE is used to project both treated and untreated stands and compute the resulting fuel parameters for each planning period. Timber and non-merchantable material amounts can be recorded and used for developing recourse management scenarios.

Once an OptFuels model is built, the solver develops alternative treatment schedules for user-specified scenarios. Users specify the fire scenario including the wind direction and speed, the fuel moisture conditions, and ignition points, assign one or more optional constraints on such things as acres to treat, or treatment budget. The OptFuels solver then determines the location and timing of treatment activities to minimize the expected loss from future fire across the planning area.

An OptFuels solution consists of the schedule of treatments selected by the solver, the associated expected loss value, the amounts computed for the constraints, the FlamMap fire behavior summary reports for both the untreated and treated landscapes, and FlamMap-ready landscape files for both the untreated and treated landscapes. These files are useful for additional FlamMap analyses that could be run on the solution results.

A. System design

Input Data and Model Building Process

Figure 1 presents a flow diagram of the OptFuels data input and model building process. This process can be divided into four components: Framework data, Planning area, Model build, and Fuel treatment scenario specifications.

Framework data – These data are not specific to a fuel treatment planning area, they are expected to apply to multiple planning areas that have similar conditions. The Framework data includes:

- Master list of variables, which become GIS attributes that are used to categorize information in the Framework data. These variables (GIS attributes) include the treatment zones used in assigning management regime options to polygons, the value-at-risk categories present on a polygon, and attributes used in cost table lookups.
- Fuel treatments are defined using FVS keywords for mechanical treatments (such as THINBBA), and prescribed fire. Additional keywords can be used to control fuel calculations (FIRECALC, FUELCALC, and FUELMODL) in FVS. Activity-costs can also be entered to account for administrative and other costs. Costs can be entered as a simple average, or in a table lookup where costs vary by user-defined attributes, such as slope or aspect.

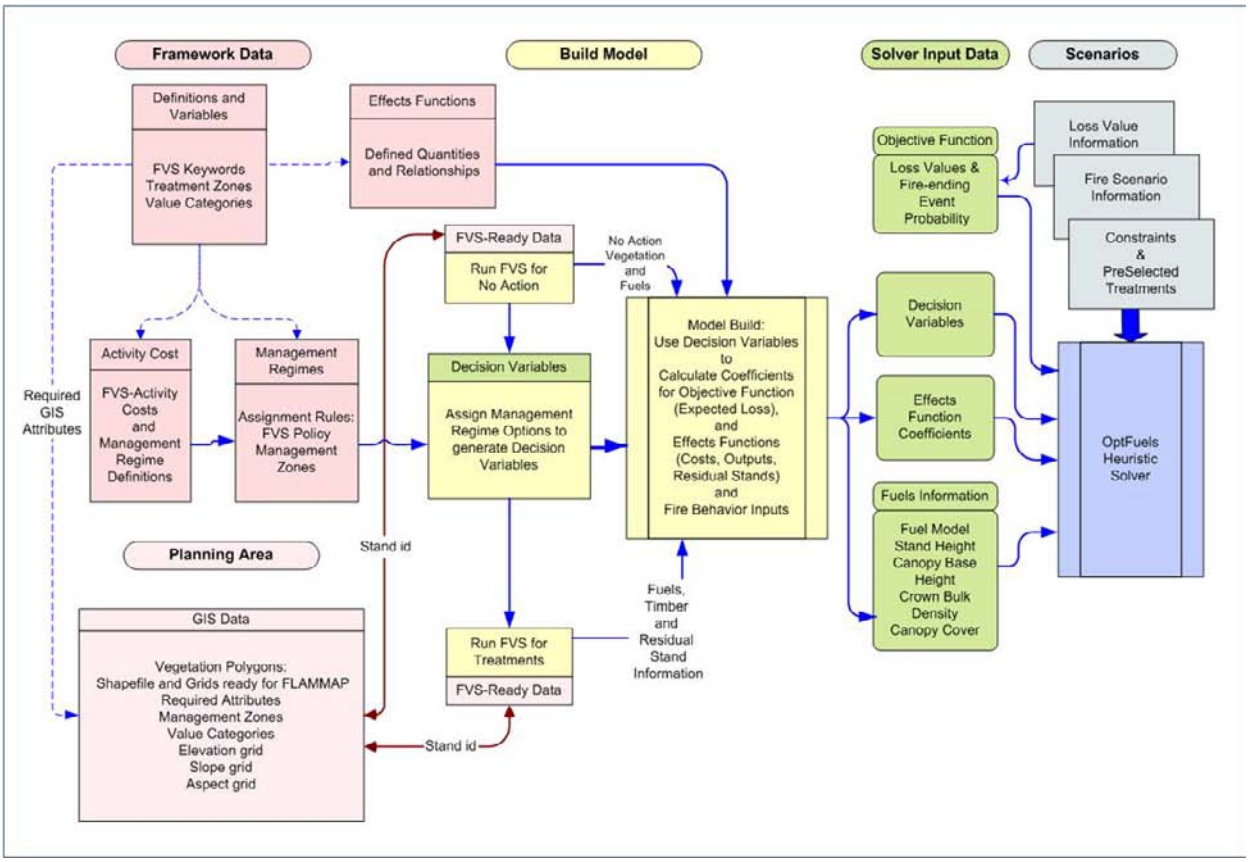

Figure 1. The OptFuels data input and model building process.

- Management regime definitions. Each management regime is comprised of one or more FVS and non-FVS activities as a sequence (for example: sale preparation cost, followed by mechanical thinning, followed by a broadcast burn) that occurs in a planning period. A given treatment unit polygon may have options for treatment in each planning period.
- Rules for assigning management regimes as options to the GIS polygons. These rules are based on the vegetation and fuel conditions present in the polygon as well as the management zone where the polygon resides. For example, management regimes with mechanical treatment can be limited to a zone where road access exists, or to specific stand conditions (or both). In the same manner, individual (or all) management regimes can be excluded as options in riparian areas or other restrictive land management zones.
- List of the value-at-risk categories for use in the expected loss calculation such as structures, critical wildlife habitat, and so on.

Planning area – These data are comprised of a GIS vegetation polygon coverage that includes the GIS attributes used in the framework data (attributes for management zone, value-at-risk categories and cost table lookups) and an identifier that associates each polygon to FVS-ready stand data. The GIS data goes through validity and completeness checks to ensure all necessary information is present prior to the model building process. The GIS data also include raster grids for elevation, slope, and aspect, and polygon (treatment unit) boundaries.

Model building process – This begins with an OptFuels interface running FVS-FFE for the no action alternative for each unique set of FVS-ready data. One set of FVS-ready data may apply to one or multiple GIS polygons. This design avoids having to run the same FVS-ready data for each polygon to which it applies. The FVS-FFE no action run projects the FVS-ready data though the planning periods (from 1 period to a maximum of 5 periods) and computes the fuels information needed for fire behavior modeling in each planning period.

The management regime assignment rules are applied using results of the no action FVS-FFE runs and the management zone information to assign the management regime options to the polygons. This process creates the decision variables for the OptFuels solver.

Next, the OptFuels interface runs FVS-FFE for the treatments in the management regimes using the FVS-ready data. As with the no action FVS runs, only the unique combinations of management regimes and FVS-ready data are simulated by FVS-FFE. The FVS-FFE simulations project the stands that the FVS-ready data represent through the planning periods, applying the treatment sequences for the management regimes. These simulations compute the fuels information needed for fire behavior modeling in each planning period, as well as the wood product volumes removed by mechanical thinning and statistics describing the residual stands. The fuels data are stored for use by the OptFuels solver.

The last step in the model building process integrates the decision variable information, GIS data, framework data, and results from the FVS-FFE runs to compute the Effects Function Coefficients of each decision variable and stores these results for use by the OptFuels solver. The Effects Functions are computations of model quantities such as acres treated, costs, timber products, and non-monetary resource benefits and impacts as defined by the user. An Effects Function Coefficient measures the contribution of a specific decision variable to a specific Effects Function.

Fuel treatment scenario specifications – There are three components to specifying a scenario for the OptFuels solver: 1) Loss value information, 2) Fire scenario information, and 3) Constraints and preselected decision variables. The loss value information includes the items of information used in computed expected loss. Loss values for value-at-risk categories are entered by flame length. Following the approach of Calkin and others (2010) we recommend quantifying loss from wildland in terms of percentage loss relative to no fire occurring. This results in an index based on percentage loss that is used by the solver to schedule treatments (the objective is to schedule treatments in the way that minimizes this loss value index). Loss can instead be quantified in dollar terms at user discretion. Users have the ability to apply weights to the value-at-risk categories to reflect their relative importance for guiding fuel treatment decisions. The final item in the loss value information is a table of probabilities for fire duration. These fire duration probabilities could be developed by analyzing the duration of past fires, or through using historical weather data to estimate the probability of fire ending weather patterns at over various numbers of days. We recognize that MTT models fire spread assuming constant fire scenario conditions. However, in the real world, fire spreading weather is not continuous but rather occurs only in blocks of time. Days of fire duration in the real world can be converted to minutes of active fire spread in the fire behavior modeling by estimating the average number of active spread minutes in a 24-hour day.

The fire scenario information for OptFuels is the same information used for MTT. This includes fuel moisture files, custom (optional) fuel model file, fire weather information, and other fuels information (fuel moisture conditioning files, ground fuels etc.). The ignition points for the fire scenario are also specified. In addition, the number of fire spread minutes to run the MTT in the solving process must be specified. This value should be slightly larger than the estimated time needed to spread fire from the ignitions points across the planning area given the specified weather and fuel moisture information.

Constraints and preselected decision variables are optional. Constraints may be imposed on the solution by selecting an effects function and entering limits on its value. This is where limitations on budget, treatment acres, or other such effects function calculations can be specified. The user also has the option to set decision variables (a decision variable is a specific treatment on a specific polygon in a specific period) into the solution. Preselected decision variables occur in the solution schedule regardless of their effect on the objective function or constraints. Preselecting decision variables can be used to test the effects of specific treatments in specific locations, sets of treatments, or use sets of treatments in specific locations as the starting point for a new solution.

Heuristic Solver

The heuristic solver employed in OptFuels is designed to develop a number of alternative fuel treatment schedules (solutions), evaluate the cumulative effects of each alternative treatment schedule, and choose the best fuel treatment schedule that produces maximum treatment effects (minimize overall expected loss) over time while meeting given resource and operational constraints. The solver includes a subroutine to develop FlamMap landscape (LCP) files that represent vegetation and fuels attributes in each time period as treatment effects. Through dynamic link libraries (DLLs), the solver automatically runs the MTT algorithm on each LCP file and stores the outputs (i.e., flame length and fire arrival time in each pixel) for solution evaluation (Figure 2). Each solution is evaluated as the sum of expected loss value of a given

study landscape over time (Equation 1). Expected loss value in each pixel depends on user-defined relative value of the pixel and burn probability, and estimated flame length and fire arrival time retrieved from the MTT output.

$$Minimize \sum_{t\in T}\sum_{c\in C}\sum_{f\in F} Loss_{f,c,t} \times Y_{f,c,t} \times P_{c,t} \qquad \text{[Eq.1]}$$

Where

f is an index of flame length category,

c is an index of grid cells (pixels),

t is a time period,

$\boldsymbol{Loss_{f,c,t}}$ is an expected loss value of grid cell *c* at flame length category ***f*** in time period ***t***,

$\boldsymbol{Y_{f,c,t}}$ is a binary variable indicating the flame length category of cell ***c*** in period ***t***, and

$\boldsymbol{P_{c,t}}$ is a probability of cell c being burn by given fire scenarios (fire ignition locations and durations) in time period ***t***.

A simulated annealing (SA) algorithm is employed in the solver for the optimization engine. Simulated Annealing (SA) is a heuristic search technique that has been widely used to solve large combinatorial problems in various fields (Kirkpatrick and others 1983). The ideas that form the basis for SA were first published by Metropolis and others (1953) in an algorithm to simulate the cooling of materials in a heat bath - a process known as annealing. The approach is a Monte Carlo method that uses a local search in which a subset of solutions is explored by moving from one solution to a neighboring solution. To avoid becoming trapped in a local optimum, the procedure provides for an occasional acceptance of an inferior solution to allow it to move away from a local optimum. The SA algorithm employed in the heuristic solver is briefly explained below and illustrated in Figure 3. Any combinations of budget and acreage constraints can be considered during the optimization process.

Step 1. Develop and evaluate an initial solution. Store the solution as the current solution.

Step 2. Create a new solution by slightly modifying the current solution (randomly select a set of treatment polygons and assign new fuel treatment options including no action).

Step 3. Check the feasibility of the new solution. If the solution violates any of the constraints, discard the solution and go back to Step 2. Evaluate the new solution, otherwise.

Step 4. Accept or discard the new solution based on the SA solution acceptance rule.

Step 5. Go to Step 2 until predefined stopping criterion (i.e., ending temperature) is met.

In order to implement the SA search process, several control parameters need to be set by the user. These include beginning and ending temperatures, repetitions at each temperature level, and temperature cooling rate. The OptFuels interface provides four options for the user to choose from: low intensity, medium intensity, high intensity, and custom option. The higher

intensity option runs more iterations and thus can likely provide a better solution than the other two lower intensity search options, but requires a larger amount of computation time.

Test runs of the initial version of the solver indicated that the solver required a considerable amount of computation time due to the fire simulation process by MTT and the complexity of spatial and temporal scheduling problems. To improve the efficiency of the solution process, the current version of the heuristic solver was designed for multi-threading and multi-processing using OpenMP with Visual C++. As a result, the solver can now simultaneously run MTT for multiple time periods, and the computation time can be significantly reduced.

System Outputs

A tabular report is created for the schedule of treatments developed by the OptFuels solver. This report includes the expected loss value by planning period and the total expected loss across periods, the values computed for the effects functions, and a listing of the treatments selected by polygon. In addition there are options for spatially displaying various aspects of the treatment schedule solution. GIS maps can show the polygons treated by planning period. The expected loss values computed for the treatment schedule can be mapped for each planning period, showing where loss is expected to occur on the landscape. Finally, the contribution that each polygon makes to individual effects functions can be mapped. This could be used, for example, to see spatial distribution of costs or revenues across the planning area.

OptFuels also outputs selected landscape (LCP) files that were created by the solver to run MTT in the solution process. An LCP is the proprietary format for the fire behavior models FARSITE, FlamMap, and MTT and represents a multi-value spatial grid that includes slope, aspect, elevation, and five fuel characteristics. LCP files are output for each planning period for the treatment schedule developed by the solver and for no action. These LCP files can then be used in FlamMap to develop fire behavior information for the planning area both with and without treatment, including landscape raster grids of fire arrival time and flame length.

B. Test Areas and Test Runs

Trapper-Bunkhouse study area

This 34,000-acre study area is on the west side of the Bitterroot Valley west of Darby, Montana (Figure 4). Private property and state lands border the project area to the east and the Selway-Bitterroot Wilderness bounds the project area to the west. The wildland urban interface encompasses about 70% of the project area.

Existing fuel loads (including live trees) pose a threat to the public, fire fighters and natural resources. Any large fire (>100 acres), or multiple ignitions in one day on the Bitterroot Face has the potential to overwhelm suppression forces and travel unimpeded to the Forest

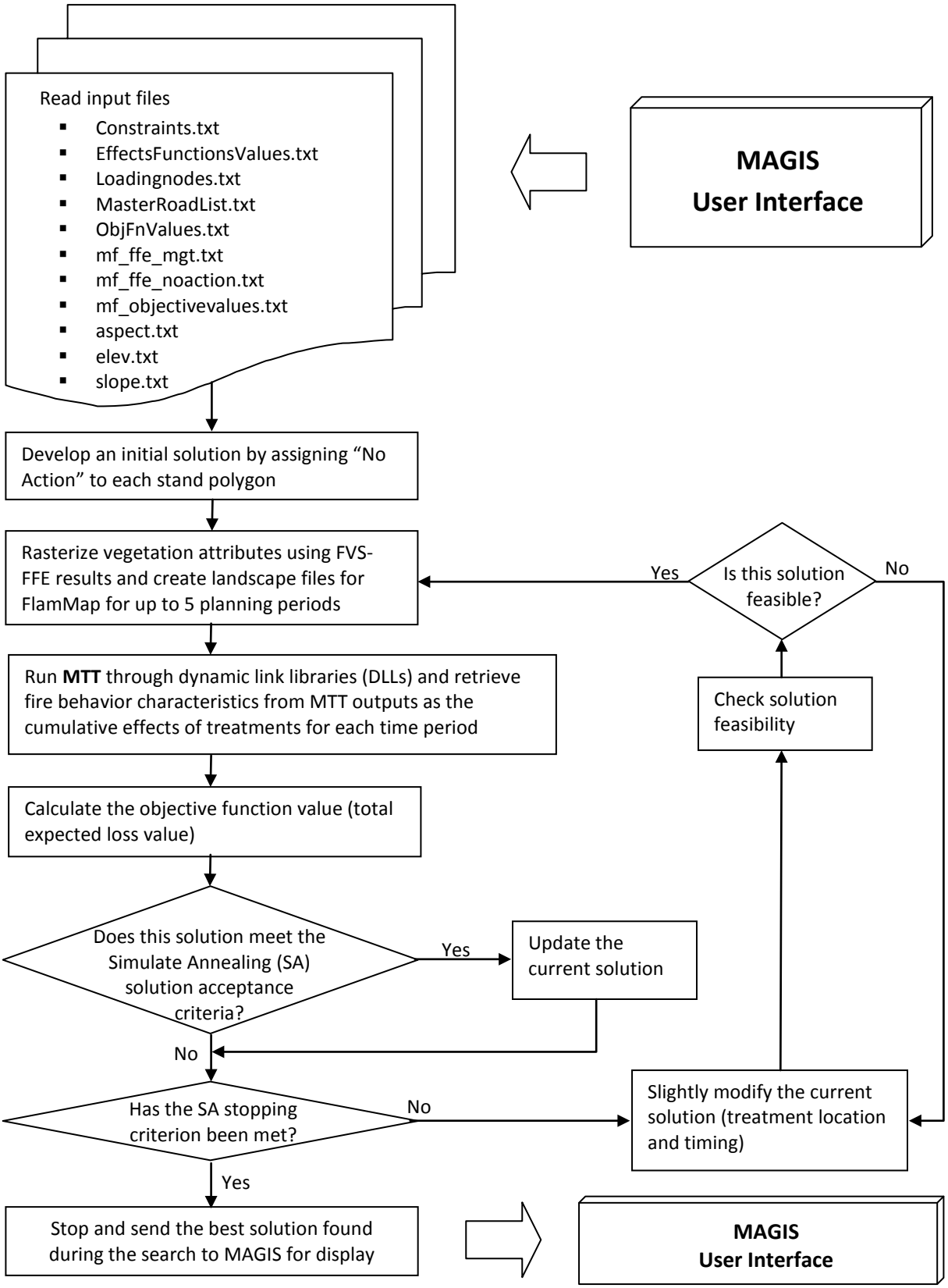

Figure 2. Data flow and analysis employed in the Heuristic Solver to optimize fuel treatment schedules.

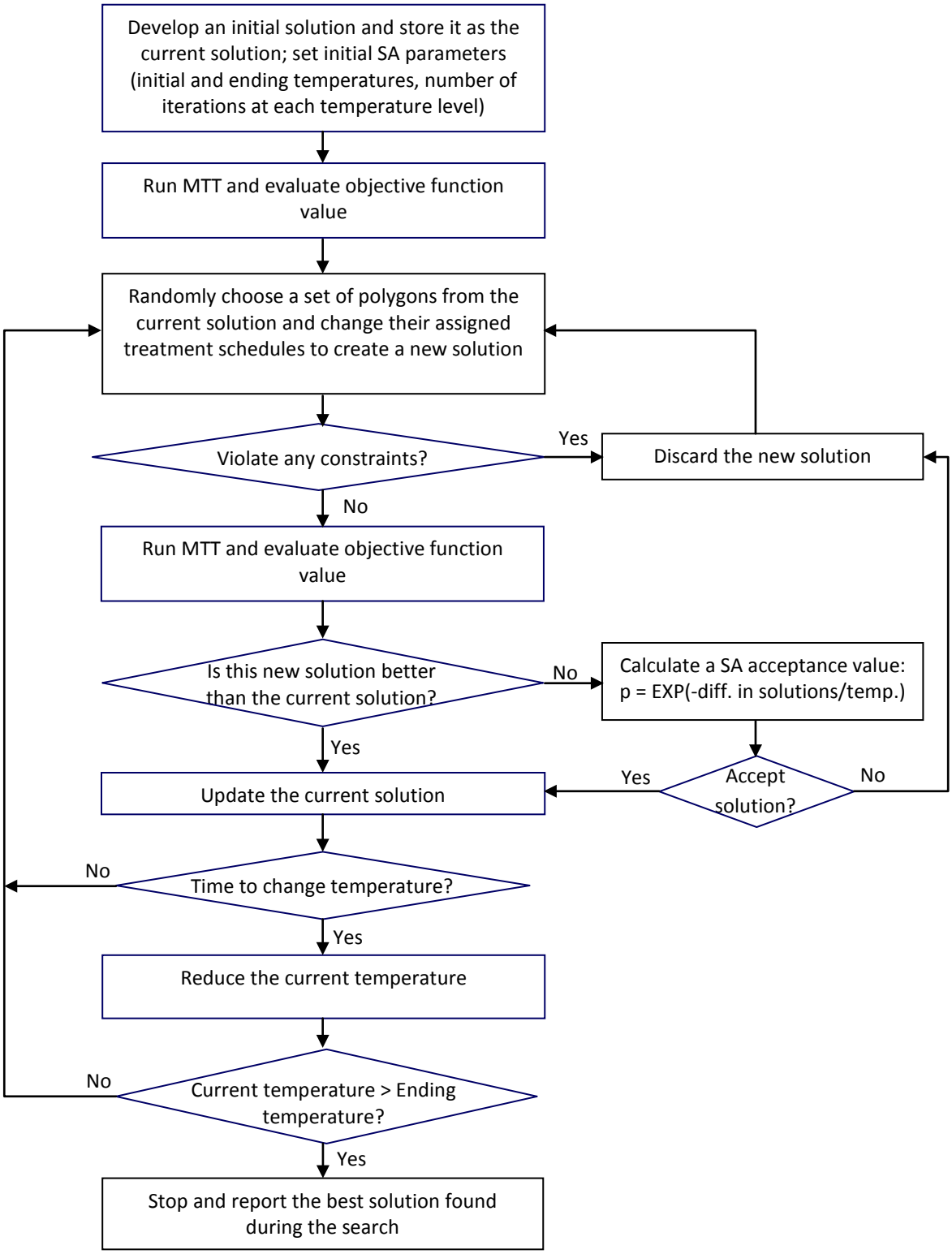

Figure 3. Simulated Annealing algorithm employed in the Heuristic Solver to optimize fuel treatment schedules.

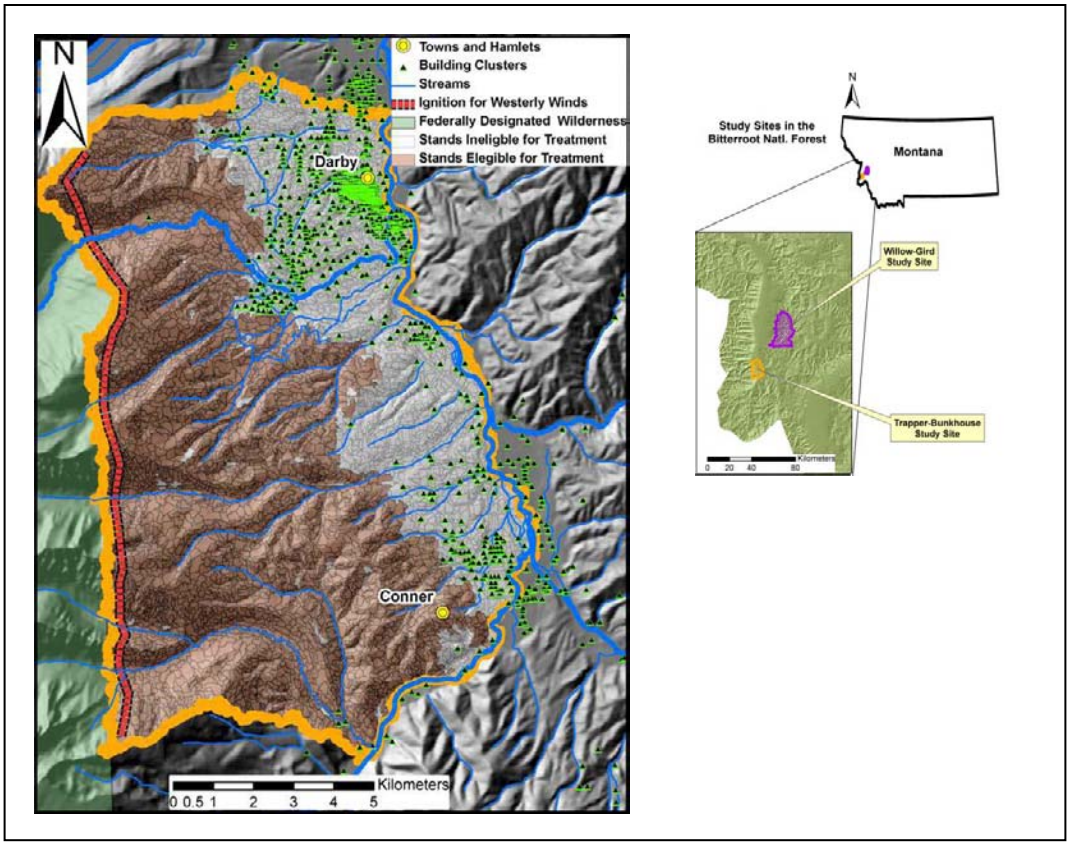

Figure 4. Trapper-Bunkhouse study area.

Service/private boundary and onto private property. This scenario has been demonstrated by the Ward Mountain Fire (1994) and the Blodgett Fire (2000) in which there were homeowner evacuations. The Little Blue Fire (2000) started more than four miles from private property on a remote portion of the West Fork Ranger District, but within 10 hours resulted in home evacuations in the wildland urban interface.

The vegetation structure in the majority of the project area has grown into overstocked, dense stands that are at increased risk of stand-replacing crown fires or intensities that cannot be directly attacked by fire fighters. These dense stands are also susceptible to insect infestations. Eighty-two percent of the project area is highly departed (fire regime condition class 'FRCC' 3) and eighteen percent is moderately departed (FRCC 2) from historical fire frequency and severity, and from historic vegetation structure and fuel loads.

The OptFuels model for this area contained fuel treatment options for 23,957 acres of the 34,000-acre study area. The Restore option was available on 17,014 acres on which prescribed burning could not be accomplished without first reducing ladder fuels. Restore is a mechanical thinning from below designed to remove ladder fuels and reduce stand density to approximately 50-60 ft^2 of basal area per acre, followed by a broadcast burn to remove activity fuels and small trees. The RxFire option, which applies prescribed fire without mechanical thinning, was available on 6,933 acres.

Five value-at-risk categories (Figure 5) were used in the expected loss calculation: 1) residential parcels that were stand polygons that contain structures, 2) wildland urban interface (WUI) that was defined as polygons within one-half mile of private structures, and 3) national forest system (NFS) acres not having any other risk category. Loss response functions from Calkin and others (2010) provided the basis for assigning percent loss by flame length categories. Percent loss for residential parcels received an importance weight of 10, wildland urban interface a weight of 8, national forest systems acres not in any other category received a weight of 1.

The fire scenario was a line of ignition on the west boundary of the study area with winds out of the west at 20 mph (Figure 4). Foliar moisture content used the FlamMap default of 100%. Fuel moisture conditioning was used.

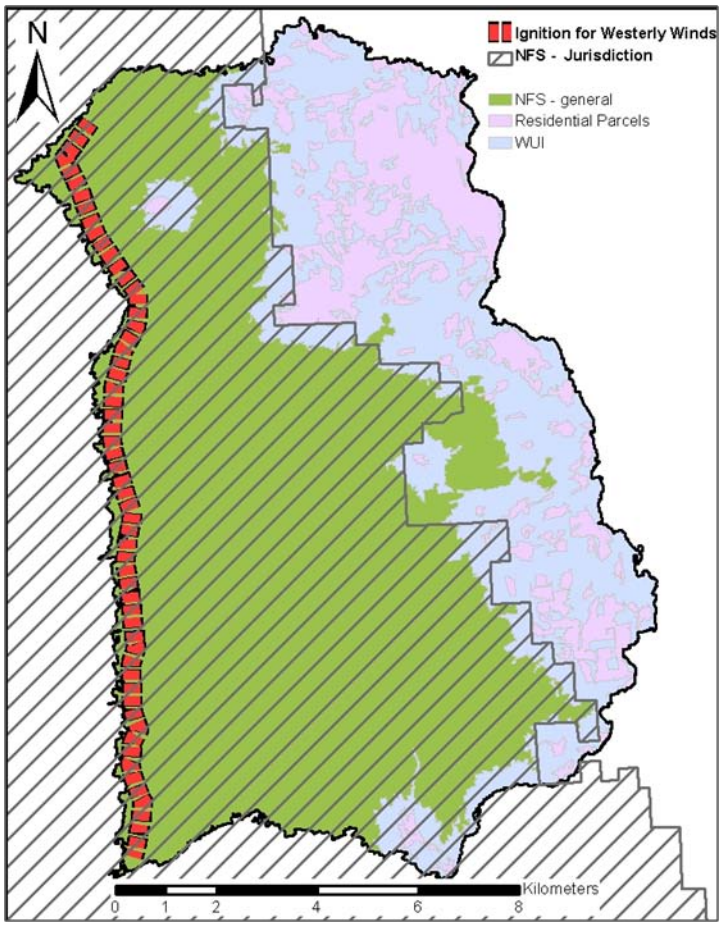

Figure 5. Value-at-risk categories for the Trapper-Bunkhouse study area.

The fire duration probabilities used were derived from weather station data:

Duration category (minutes of active spread)	Probability of a fire of that duration
< 840	0.9
840 – 1680	0.7
1680 – 2520	0.6
2520 – 3360	0.6
3360 – 4200	0.6
4200 – 5040	0.5
5040 – 5880	0.2
5880 – 6700	0.1
6700<	0

Figure 6 compares the expected loss index for no action with three treatment scenarios with increasing percentages of the 23,957 candidate acres treated per period: 10, 20, and 25 percent. The graphs show the percent of pixels in the entire planning area having each category of loss. In period 1 there is a higher percentage of the area in the 2-6 loss category with increasing percentages of candidate acres treated per period. This result indicates that the acres in the higher loss value categories with no action have moved to the low loss category (2-6) as a result of treatment.

In period 2 the differences with increasing amounts of treatment are much greater, reflecting the residual effects of treatments in period 1 plus the effects of treatments in period 2. Figure 7 compares the loss value index summed across periods for the treatments scenarios with no action and 100% of the area treated in period 1, the lowest possible loss with the treatment options modeled. Treating 20% of the candidate acres per period achieved 28% of the reduction relative to treating the entire landscape in period 1, while treating 25% per period achieved 55% of the reduction.

The flame lengths and arrival times modeled by MTT for the treatment scenario and no action are presented in Figures 8 and 9, respectively. Differences in flame length in period 1 are not pronounced, with somewhat larger differences shown for period 2. Again, the result shows that the acres in the higher flamelength categories with no action have moved to the lower flame length categories (e.g., 0 or 1) as a result of treatment. By comparison, the differences in arrival time across the scenarios were larger, particularly in period 2. The arrival time differences appear to account for the majority of the reductions in expected loss with the higher treatment rates.

Figure 10 shows arrival times across the landscape for the 10% and 25% treatment scenarios compared with no action. Arrival times are most increased in period 2 which includes the effects from both period 1 and 2 treatments. Arrival times are most increased in the wildland urban interface in this fire scenario, resulting in less expected loss in that portion of the study area (Figure 11).

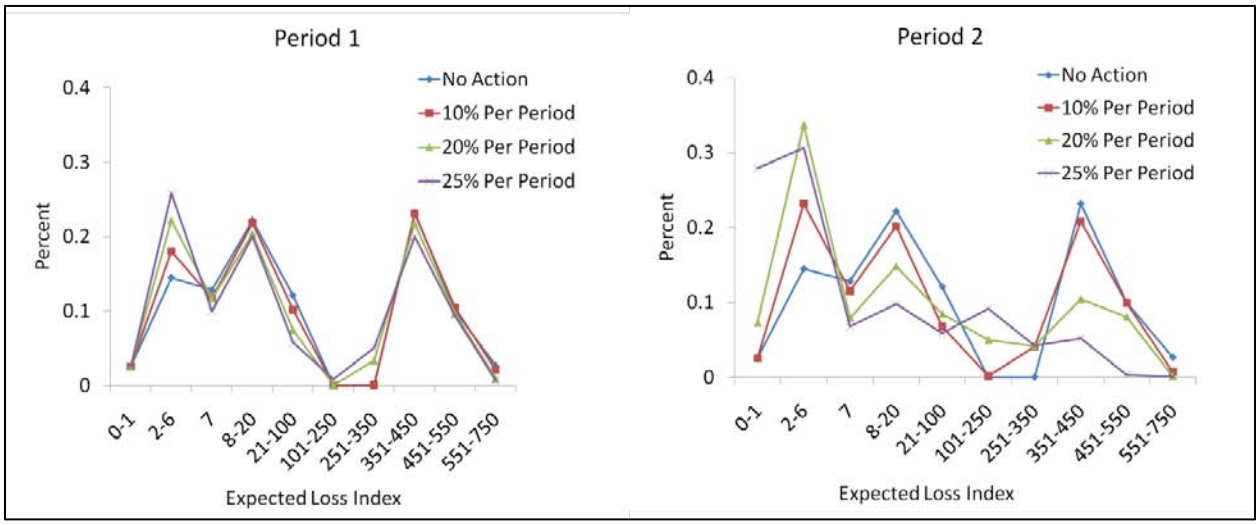

Figure 6. Expected Loss Index by percent of planning area compared across three treatment schedules and no action for periods 1 and 2.

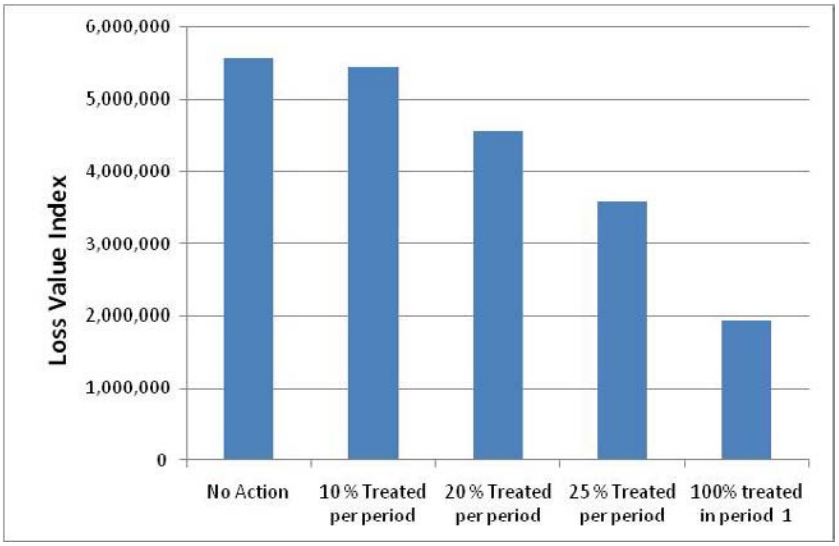

Figure 7. Loss value index summed across periods.

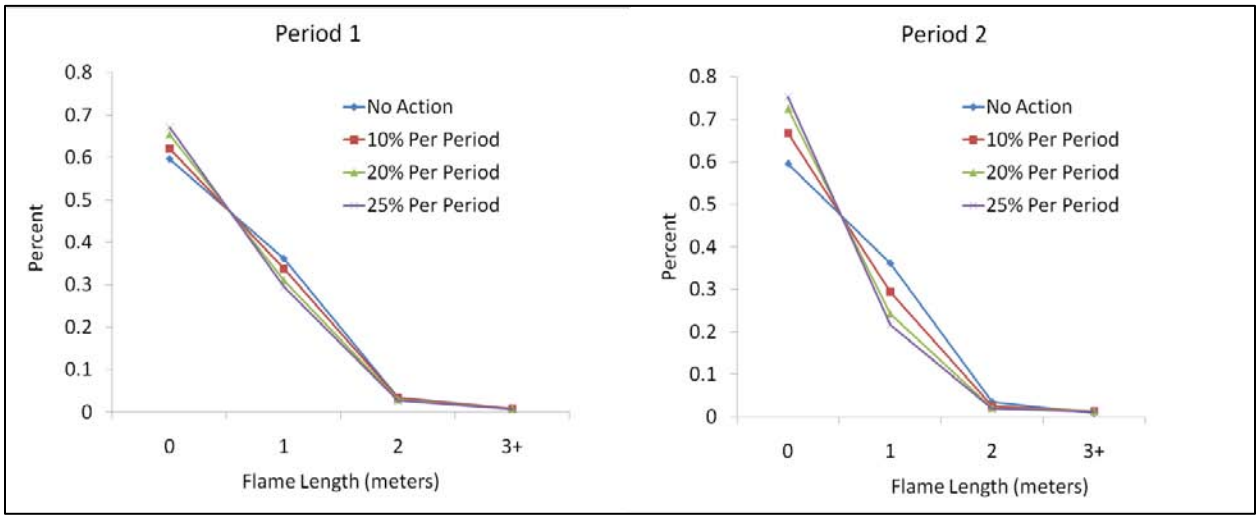

Figure 8. Flame length by percent of planning area compared across three treatment schedules and no action for periods 1 and 2.

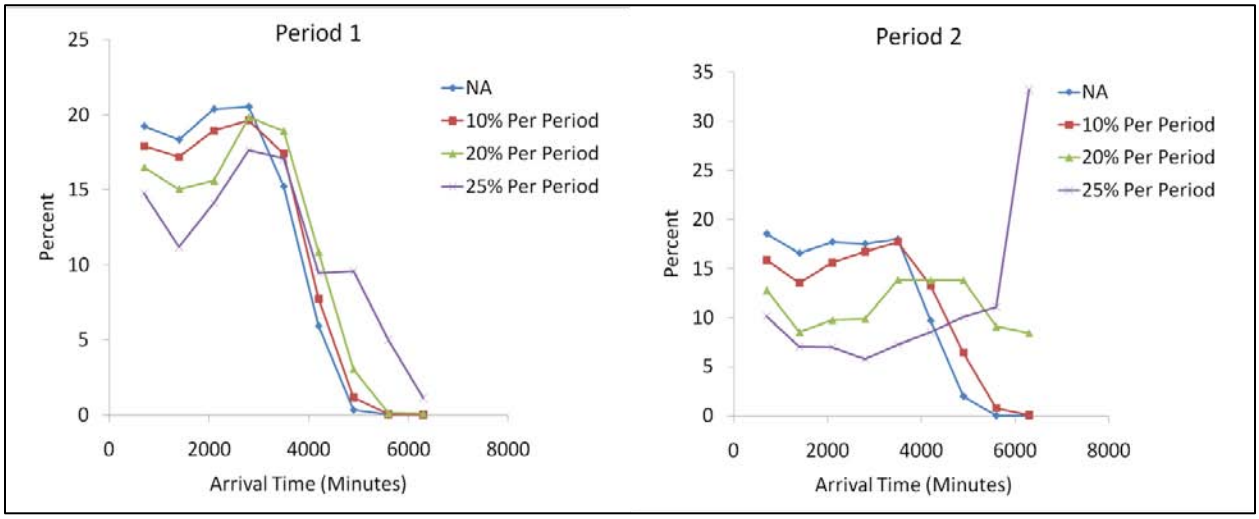

Figure 9. Arrival time by percent of planning area compared across three treatment schedules and no action for periods 1 and 2.

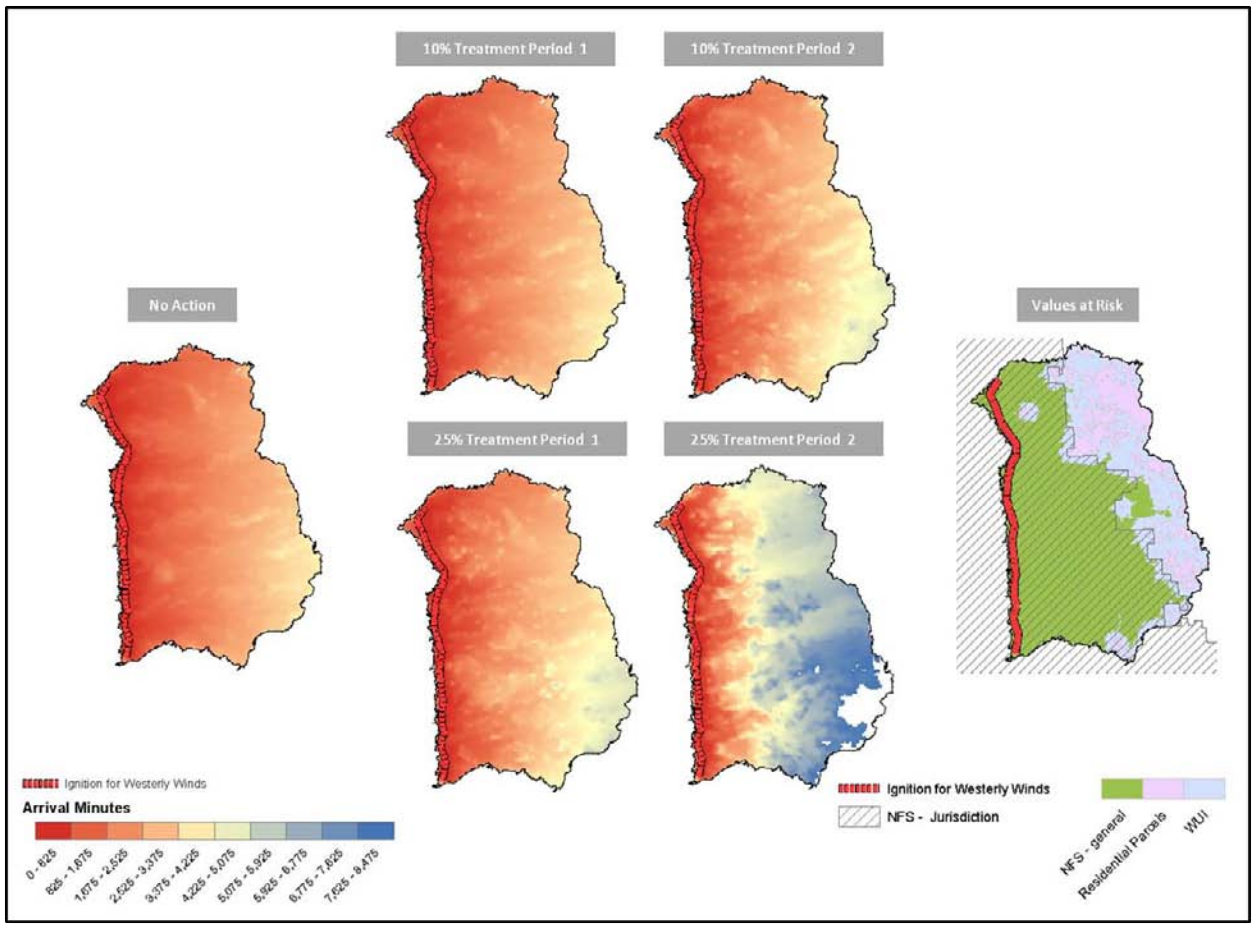

Figure 10. Period 1 and 2 arrival times for the 10% and 25% treatment scenarios compared with no action.

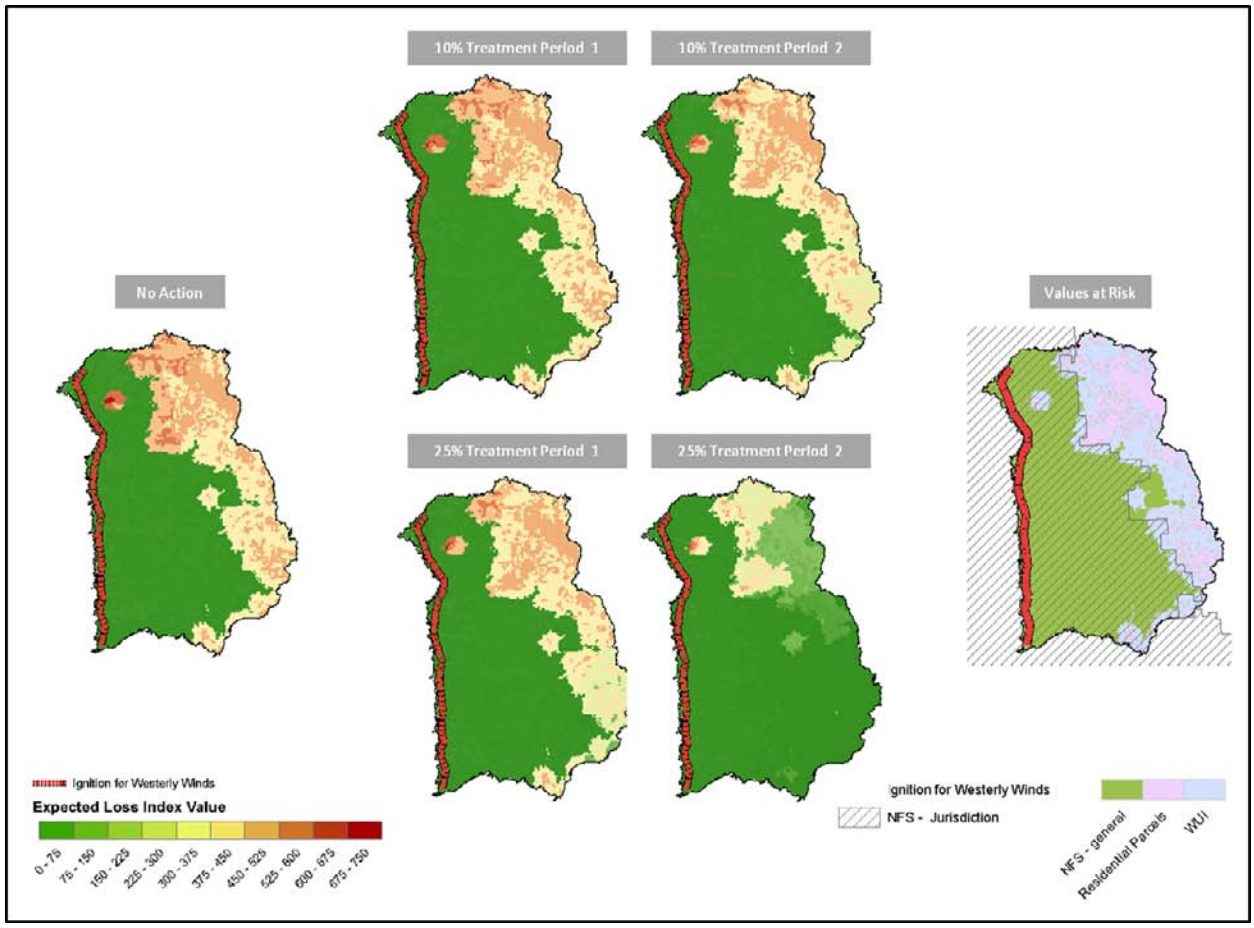

Figure 11. Period 1 and 2 loss values for the 10% and 25% treatment scenarios compared with no action.

Willow-Gird study area

The Willow-Gird study area of 103,689 acres is on the north-east side of the Bitterroot National Forest, straddling the Stevensville and Darby Ranger districts (Figure 12). It is bounded on the west by the Bitterroot Valley and Corvallis, MT, where there is rapid development of residential areas up into the area between Corvallis and the National Forest. To the east are the Sapphire Mountains forming a divide into another developed residential area, Rock Creek, a premier fishing area. The vegetation structure in the majority of the project area has grown into overstocked, dense stands that are at increased risk of insect and disease attack. The area is being considered for restoration treatments to thin dense stands of Ponderosa pine and Douglas-fir at lower elevations, and regenerate native lodgepole pine at higher elevations where it has become decadent and is undergoing active mistletoe infestation, and is therefore at increasing risk for stand-replacing fire.

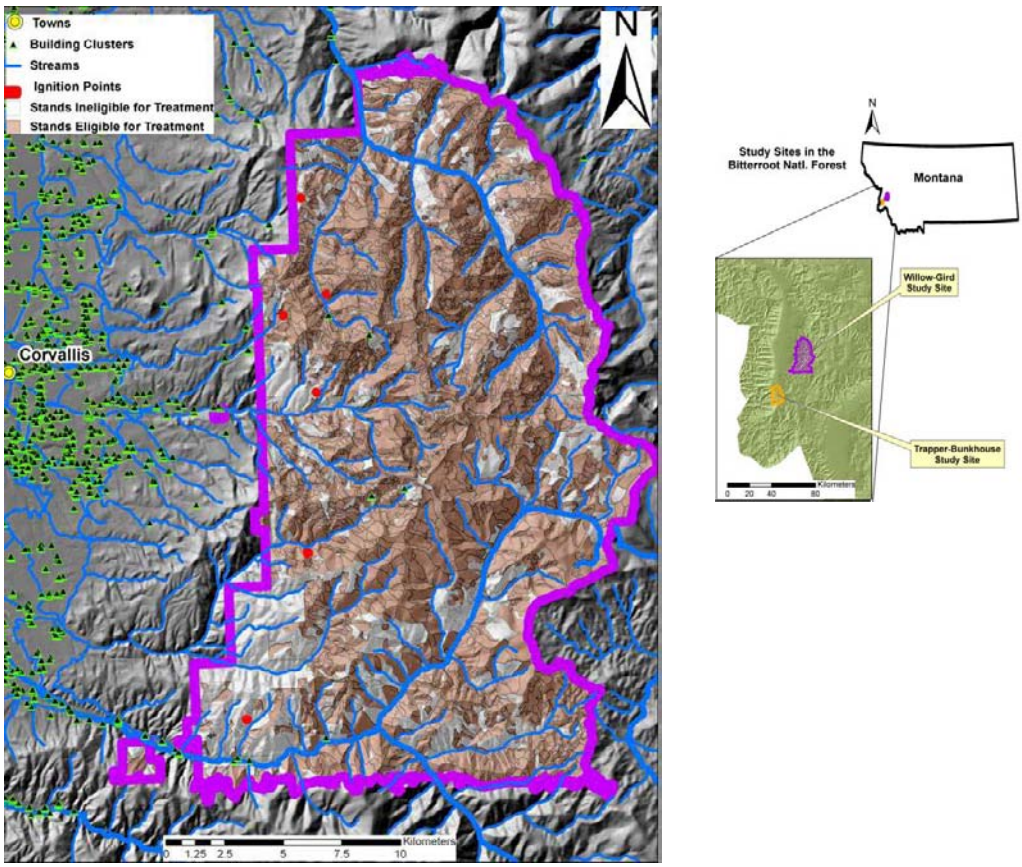

Figure 12. Willow-Gird study area.

The OptFuels model for this area contained fuel treatment options for 78,027 acres. The Restore option (same as described for the Trapper-Bunkhouse Area) was available on 23,354 acres on which prescribed burning could not be accomplished without first reducing ladder fuels. The RxFire option was available on 46,354 acres. The Lodgepole Pine Clear Cut option was available on 8,319 acres.

Five value-at-risk categories (Figure 13) were used in the expected loss calculation: 1) WUIl (wildland urban interface) – extends 0.5 mile into the national forest from the forest boundary, 2) State or Private lands, 3) Timber represents national forest acres not having any other risk category, 4) Roadless Timber is designated roadless area in the national forest, and 5) Right of Way is a power-line corridor. Loss response functions from Calkin and others (2010) provided the basis for assigning percent loss by flame length categories. Percent loss in the right-of-way power-line corridor category received an importance weight of 10, wildland urban interface a weight of 5, and all other categories received a weight of 1. The fire duration probabilities were the same as used in the Trapper-Bunkhouse Study Area.

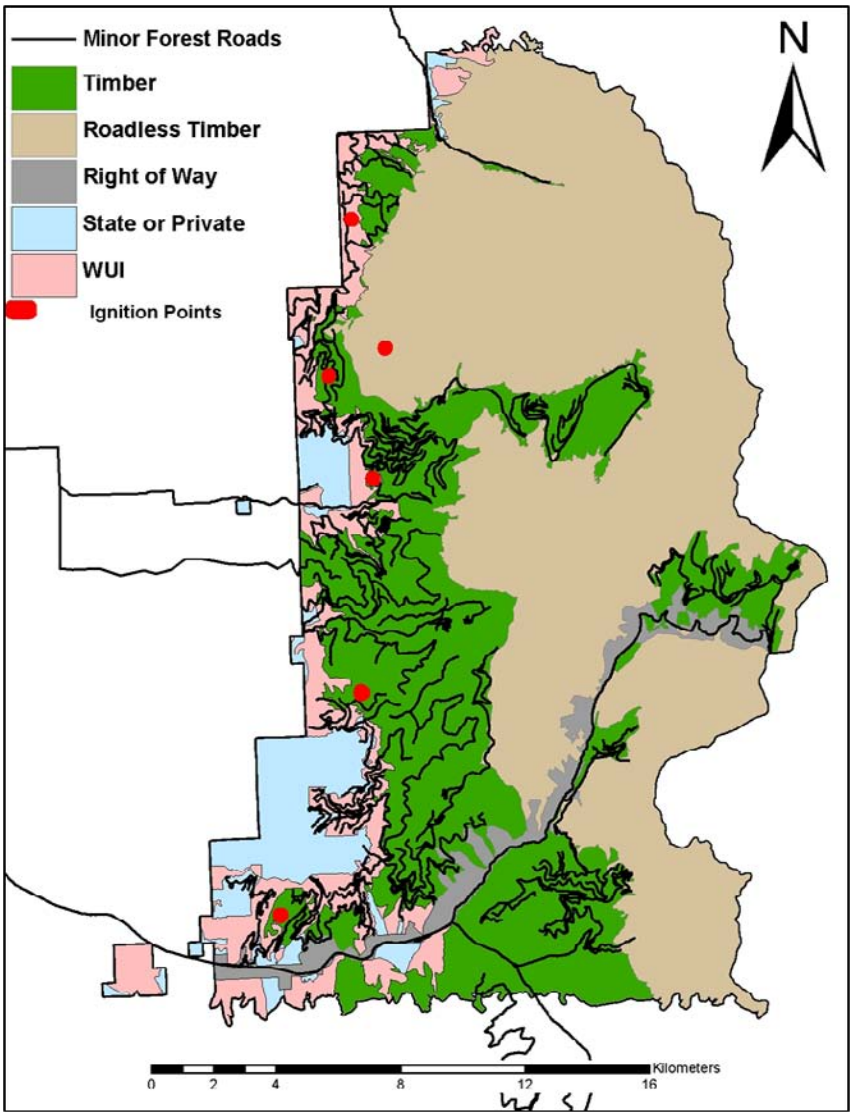

Figure 13. Value-at-risk categories for the Willow-Gird study area.

The fire scenario was the same as used in the Trapper-Bunkhouse Area except in the Willow-Gird area six ignition points were used along the west boundary to represent human-ignited fires in the wildland urban interface.

Figure 14 compares the expected loss index for no action with three treatment scenarios with increasing percentages of the 78,027 candidate acres treated per period: 6.25, 12.5, and 25 percent. While treatments increased the percent of acres in the lowest category of expected loss (drawing acres from higher expected loss categories without treatment) the amount of change was small compared to the Trapper-Bunkhouse area. This is especially true for period 2.

Figure 15 compares arrival times for the treatment scenarios and no action. Much larger differences occurred for arrival time with treatment than were shown for expected loss. Although increases in arrival time were created by the treatments, treatments were unable to

increase the arrival times sufficiently in the areas on the landscape having the highest expected loss. This occurs because of the relatively close proximity of the ignition points and the WUI which represents the greatest concentration of values at risk (Figure 13). Thus, relatively little reduction in expected loss was achieved by the fuel treatments modeled.

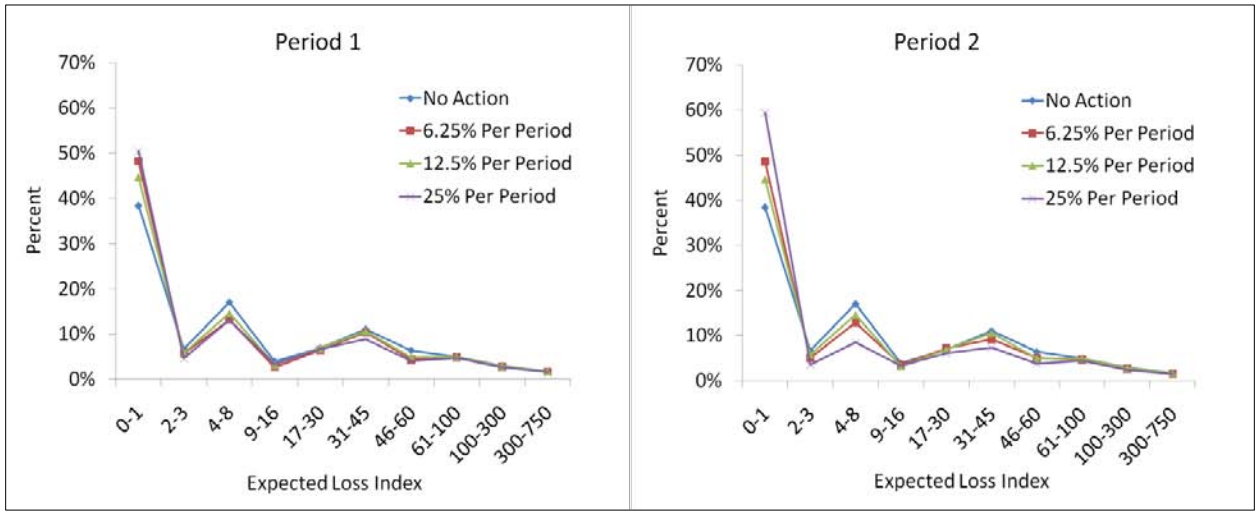

Figure 14. Expected Loss Index by percent of planning area compared across three treatment schedules and no action for periods 1 and 2.

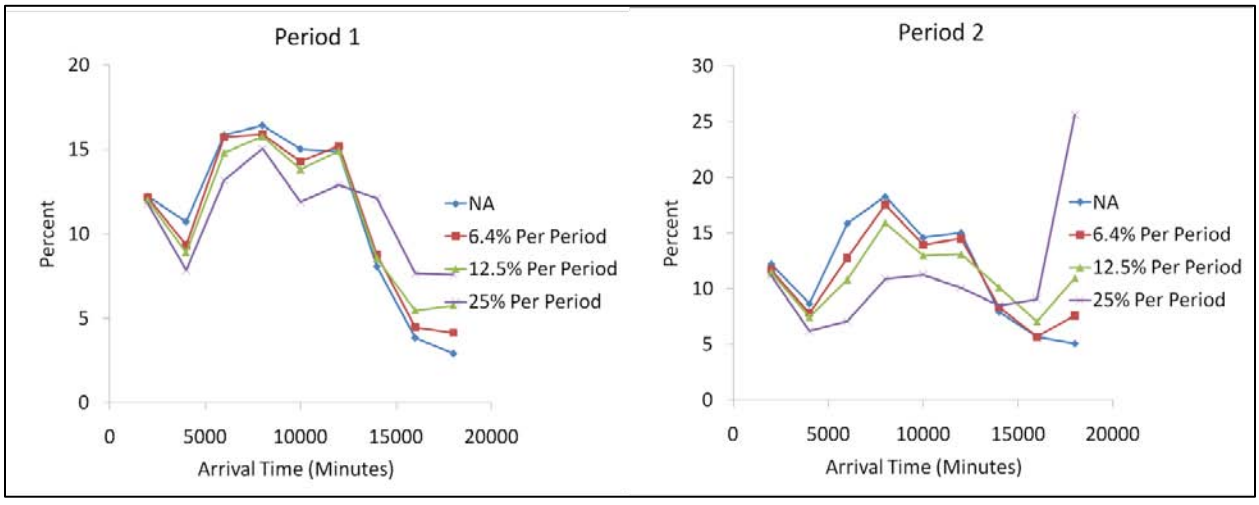

Figure 15. Expected arrival by percent of planning area time compared across three treatment schedules and no action for periods 1 and 2.

IV. Key Findings

A. Simultaneous multi-period fuel treatment analysis is feasible

This study shows that it is possible to simultaneously schedule fuel treatments across multiple planning periods, which is a computationally challenging problem. This is accomplished by computing and storing all information required by the solving process prior to entering that process. The solver makes spatial fuel treatment selections by period, and updates the landscape fuel grid files for these treatments for each planning period prior to running the minimum travel time fire behavior algorithm for each planning period. The solver also runs on a multi-processor computer to increase the efficiency of the solution process. Earlier approaches to multi-period fuel treatment planning scheduled fuel treatments for one planning period at a time without considering the continuing treatment effects in future periods and whether they can complement the effectiveness of treatments in future periods.

B. Effectiveness of system for scheduling fuel treatments across multiple planning periods

The OptFuels heuristic solver has been able to schedule fuel treatments across multiple planning periods that result in substantial reductions in the expected loss from values at risk across the landscape compared to the untreated landscape given the same fire scenario conditions. These reductions in expected loss with fuel treatment were the result of slower rates of spread (which reduces the probability that the fire duration would be sufficiently long to reach specific locations on the landscape) and lower flame lengths. Continuing effects in period 2 of fuel treatments undertaken in period 1 have been observed by comparing the arrival times and flame lengths predicted for period 2 with another scenario in which only the period 2 treatments were undertaken.

C. Limited availability of inventory data for stand polygons

OptFuels, as well as any planning process that utilizes FVS-FFE to project stand growth and predict fuel parameters for fire behavior modeling, requires FVS-ready inventory data that accurately represent each stand polygon in a planning area. Unfortunately, inventory data needed to produce FVS-ready tree list and stand data are essentially unavailable for stand polygons in forested landscapes. This means that anyone interested in conducting this type of analysis must develop FVS-ready inventory data for each polygon (or grid cell if the analysis is strictly raster-based) if the data does not exist. The best option for accomplishing this appears to be imputation, which in essence matches available inventory plots (such as FIA plots) with stand polygons.

We went through this imputation process numerous times for our two study areas using different combinations of x and y imputation variables with somewhat less than satisfactory results, using a combination of FIA plots and additional plots taken in the project area. In particular, the percent crown closures calculated for the imputed data were consistently much lower across the study area than the crown closure percentages predicted by both R-1 V-Map (Brewer and others 2004) and Landfire, which the study team believed to be a better representation of the study area. These lower density representations of the stand polygons affected the FVS-FFE simulations and the resulting fuel parameters, both with and without treatment. This in turn affected the fire behavior modeling, which even with severe fire conditions consistently predicted less severe fire for the untreated landscape than observed from recent past fires in the same general area.

D. Importance of selecting effective fuel treatment options

It is important for obvious reasons to select fuel treatment options that are effective at reducing undesired fire behavior, namely reducing the rate of spread and/or flame length. If the OptFuels solver does not have effective treatments options to select from, it cannot be expected to develop spatial fuel treatment schedules that effectively reduce expected loss from the values-at-risk on the planning landscape. Our experience has been that developing effective fuel treatment options is not as straightforward as one might think. There have been many cases in which thinning to remove ladder fuels followed by a broadcast burn to treat the activity fuels and remove small trees resulted in the same fire behavior as the untreated stand. This highlights the importance of thoroughly testing both the untreated and treated stand fire behavior while selecting treatment options for use in OptFuels.

V. Management Implications

A. Benefits to analyzing spatial fuel treatment schedules over multiple planning periods

This project has developed and tested OptFuels, an approach for spatially scheduling fuel treatments over time based on minimizing the expected loss of values-at-risk from future wildland fires. OptFuels utilizes FVS-FFE, a well known model for simulating vegetation change, and the Minimum Travel Time option in FlamMap, a well known model for simulating fire spread spatially across landscapes. The OptFuels solver accounts for treatment effects across planning periods in selecting the locations for treatments in each period. Thus the treatments selected for period 1 are not only selected for their effectiveness in modifying fire behavior in period 1, but also for their continuing effect subsequent periods, which is combined with treatments taking place in those subsequent periods.

In addition, OptFuels provides for various types of constraints that can be used to assess trade-offs to better inform decision makers. For example, multiple OptFuels runs with increasing budget constraints can be used to assess the additional fuel treatment benefits that can be achieved over time with increasing fuel treatment costs for a planning area. The effect of increasing budget levels can be measured in terms of change in fire arrival times in specific locations within the planning area, change in flame lengths in specific locations, and change in expected loss from the values-at-risk across the planning area.

Constraints on acres treated can be used to assess trade-offs associated with the amounts of specific types of treatments applied in specific management zones in a planning area. Assume for example, that mechanical fuel treatments are detrimental in a wildlife habitat management zone. Multiple OptFuels runs (in which increasingly limiting constraints are placed on acres of mechanical fuel treatments in that zone) can quantify how much fuel treatment effects are compromised across the landscape by reducing or eliminating mechanical treatments in that zone.

In addition, the connection with FVS provides OptFuels with the ability to estimate wood products and woody biomass that is produced by mechanical fuel treatments. Both the volume and value of wood products can be estimated, as can the net value (revenue minus cost) of mechanical fuel treatments.

The capability of OptFuels to spatially schedule fuel treatments over multiple planning periods and to constrain those treatment schedules in a variety of ways provides the ability to quantify trade-offs between fuel treatment objectives and other resource management issues and constraints.

B. Important to support development of landscape GIS vegetation coverage with FVS ready data

OptFuels as well as any planning process that utilizes FVS-FFE to simulate stand growth and predict fuel parameters for fire behavior modeling requires FVS-ready data that accurately represent each stand polygon in a planning area. This problem has been addressed in the research community by statistically imputing FIA and other available plot data to either stand polygons or directly to grid cells. This process is quite technical and as of this report has provided less than satisfactory representations of the landscape vegetation on the two study areas in this project (see Key Findings section). We believe it will be difficult for field users to go through the imputation process for each fuel treatment planning area they want to analyze spatially over time. This data issue threatens to hamper the use of this suite of analysis tools. Thus, we believe it is important for management to support development of landscape GIS vegetation coverage with FVS ready data.

C. Important to support development of workforce skills with the models employed by OptFuels

The models employed by OptFuels as well as OptFuels itself require GIS and other computer skills. It is important to support the development of these skills in the workforce for these models to be used effectively. In addition, these models can be run most efficiently by people who work with them on a regular basis. It is difficult for anyone to be proficient at running these models when it is done only once or twice a year. This suggests that the most cost-effective way of organizing work assignments is having a substantial portion of a position devoted to performing analyses with these models, perhaps serving multiple ID team zones or even multiple forests.

VI. Relationship to Other Recent Findings and Ongoing Work

Finney and others (2006) developed a system for spatially placing fuel treatments on a landscape over multiple planning periods to minimize undesired fire behavior. That system stepped through the analysis sequentially, one planning period at a time. After treatments for a period were selected using the TOM (Finney 2006), the post treatment landscape was projected to the next planning period using a custom version of the Parallel Processing extension of FVS (Crookston and Stage 1991). Although their conceptual design for modeling across multiple periods differed from the design we wanted to implement in OptFuels, discussions with the authors of that study were very helpful.

The expected loss computation used by the OptFuels heuristic solver is adapted from the expected net value change calculations in Finney (2005), Ager and others (2007), and Calkin and others (2010). The method of expressing loss as a result of fire as a percentage reduction in value by flame length categories was adapted from Calkin and others (2010).

This JFSP study provides the basis for a new study centered in the Lake Tahoe Basin. The objective of this new study is to develop an integrated decision support system that optimizes fuel treatment locations in time and space that can also achieve multiple management objectives. Management objectives will be implemented in a flexible manner and can include the reduction of the probability of catastrophic fire, the reduction of sediment inputs into Basin streams, the promotion of species of special concern, among others. The system will identify where, when, and how to treat fuels to maintain desired fuel reduction, forest restoration, and water quality goals at a landscape scale.

The Joint Fire Science Program, the National Wildfire Coordinating Group Fuels Management Committee, and Sonoma Technology, Inc have developed a conceptual design for the Interagency Fuels Treatment - Decision Support System (IFT-DSS). The IFT-DSS organizes fuels-planning software and data into a seamless user environment. OptFuels could provide the process in IFT-DSS for scheduling fuel treatments spatially. OptFuels utilizes FVS-FFE and fire behavior modeling for fuel treatment analyses in the same ways as does IFT-DSS. As a result, the vegetation and fuels data used in OptFuels are the same as well. We will continue to investigate the option of integrating OptFuels into IFT-DSS.

VII. Future Work Needed

A. Modify the heuristic solver to analyze the effectiveness of fuel treatment patterns on two or more fire conditions simultaneously

The current version of the heuristic solver schedules fuel treatments spatially to minimize the expected loss in values-at-risk for one fire scenario (ignition points, wind direction and speed) at a time. Solving for different fire scenarios separately is likely to schedule fuel treatments in different locations, leaving unanswered the question "What is the best pattern of treatments to minimize expected loss from these two fire scenarios over multiple periods?" In future work we plan to add the capability of developing fuel treatment schedules that minimize expected loss for a small number of fire scenarios of concern. This will involve modeling fire behavior for each of these scenarios (rather than just one scenario) at each iteration in the solution process. Users would weight these alternative fire scenarios based on their relative importance in fuel treatment planning.

B. Develop processes to assist users with preparing input data

OptFuels, as well as any planning process that utilizes FVS-FFE to project stand growth and predict fuel parameters for fire behavior modeling, requires FVS-ready data that accurately represent each stand polygon in a planning area. Unfortunately, FVS-ready data are not generally available for an entire landscape. Associating inventory data (such as FIA plots) to either stand polygons or directly to grid cells is most often accomplished by statistical imputation. This process is quite technical and as described in the Findings section, use of this technique on our study areas provided less than satisfactory representations of the landscape vegetation. Processes are needed to help fuel treatment analysts through the imputation procedures. Alternatively, agencies could supply FVS-ready data to potential users.

C. Investigate evolutionary optimization algorithms and implement the best choice in OptFuels to run the system in a multi-threading environment to more efficiently solve the large combinatorial optimization problem of fuel treatment scheduling

OptFuels currently employs a simulated annealing (SA) algorithm for its optimization engine. While SA is known as an efficient neighborhood search algorithm for solving large combinatorial problems, it is not ideal for a multi-threading/multi-processing environment due to its sequential approach to generate and evaluate neighbor solutions. In the future work, we plan to investigate evolutionary optimization algorithms, such as the genetic algorithm (GA) and genetic programming (GP), and implementing the best choice in OptFuels so that the system can be more efficiently run in a multi-threading/multi-processing environment. This modification is expected to largely reduce the system's computation time for developing quality fuel treatment schedules.

D. Integrate FARSITE into OptFuels through dynamic link libraries (DLL) to simulate fire behavior under varying weather and fuel conditions

In the future work, we plan to build a linkage between OptFuels and FARSITE using the FARSITE DLL. OptFuels currently employs FlamMap to estimate changes in fire behavior as the effects of fuels treatments across a landscape. However, FlamMap assumes constant weather and fuel moisture during its run. FARSITE overcomes this limitation and can provide more realistic fire behavior simulation with varying weather and fuel moisture conditions. The FARSITE dynamic link library (DLL) is currently under development by the RMRS Fire Sciences Lab, and will be available soon. We plan to use the DLL to dynamically link FARSITE with OptFuels for automatic data transfer during the program execution.

E. Analyze the effects of treatment polygon size (project area) on solution quality and efficiency

Dealing with individual stand polygons entails a large number of decision variables in the solution process, which increases the size and complexity of scheduling problem. In addition, decisions made on individual polygons that are independent from neighboring polygons makes it difficult for the solver to efficiently converge to the optimal or near-optimal solutions because there is a relatively small chance to simultaneously select adjacent polygons for treatment and thus the synergic effect of treating a larger and contiguous area is not easily evaluated by the solver. To further improve the efficiency of solution process in the solver, we plan to pre-define groups of treatment polygons where treating a larger and contiguous area can generate bigger treatment effects than small, distant polygons of equal total area. Decisions within the heuristic solver will be then be evaluated and made on groups of polygons in the solver as opposed to individual polygons. This will result in much fewer decision variables and narrower solution space to explore.

VIII. Deliverables Cross-Walk

Proposed	Delivered	Status
Data transfer interfaces between MAGIS, FlamMap and FVS-FFE that automate and integrate model information.	OptFuels application interfaces that include windows data entry forms, program procedures, and a recommended method for using FVS-ready data for landscape-level vegetation and fuels simulation.	Prototypes ready 2008. See Integrated DSS entry below.
Heuristic optimizer that integrates resource issues/economics with fire behavior projections for various treatment options.	C++ executable. Requires multiprocessor machine for reasonably timely results. Prototype FIREMAGIS.exe	1. First version integrated with OptFuels October, 2009. 2. Solver is functional Feb. 2010. 3. In Progress: testing with different data sets.
Integrated decision support system (DSS) with enhanced solution display to optimize fuel management schedules with enhanced GIS-based solution displays for MTT results.	Decision support system that integrates GIS, FVS-FFE, and FlamMap as a single user-driven application (OptFuels). Generates optimal feasible schedule of fuel treatments. Outputs GIS maps and files of solutions. Outputs FlamMap FMP file to allow user to run MTT on solution landscape files.	Complete (beta) version with working interfaces and procedures. Solutions can be analyzed with MTT and ArcGIS. In progress: solution reports and procedures for GIS statistics.
Test models using data from National Forest(s) with input from local management for resource objectives and constraints.	Test models from Bitterroot National Forest analyses: Willow-Gird and Trapper-Bunkhouse.	1. Trapper-Bunkhouse, September 2008. 2. Willow-Gird, May 2009. 3. Maps posted on JFSP website.
Workshops with field managers: 1.Gather feedback on proposed system 2.Present system to potential users	1.'FIREMAGIS' workshop held September 2008. 2.Workshop scheduled April 2010.	1. Powerpoint presentation on JFSP website.
JFSP reports	Annual and final reports.	Completed, posted on JFSP website.
Publications and Presentations 1.Development. 2. Effects of budget constraints.	1. OptFuels: Optimizing Placement of Fire and Non-fire Fuel Treatments over Time at Landscape Scales.	1. Paper presented at AFE 4th International Congress on Fire Ecology & Management. Savannah, GA Nov 30- Dec 4, 2009.

	2. Developing a Decision Support System to Optimize Spatial and Temporal Fuel Treatments at a Landscape Scale. 3. OptFuels: A decision support system to optimize spatial and temporal fuel treatments. 4. Effects of budget constraints on optimal hazardous fuel reduction treatment scheduling using fire behavior modeling.	2. Paper presented at Council on Forest Engineering, Kings Beach, CA June 15-18 2009. 3. Presented at the 13th Symposium on Systems Analysis in Forest Resources, Charleston, SC May 26-29, 2009. 4. In progress.
DSS Technology transfer: Website and User Documentation with active tutorials. DSS Distribution System for Software Delivery: Installation package and software delivery system (ftp and website for downloads and updates).	1. Project website: www.fs.fed.us/rm/human-dimensions/optfuels 2. Draft user guide and tutorial: www.fs.fed.us/rm/human-dimensions/optfuels/OptFuelsUsersGuide.pdf	1. Project Website live. 2. In progress: Userguide (draft manual posted), context-sensitive help, tutorials, installer.
Other Presentations / Posters.	1. Spatial and Temporal Optimization of Fuel Treatments. 2. OptFuels: Optimizing Placement of Fire and Non-fire Fuel Treatments over Time at Landscape Scales. 3. Fire-MAGIS: A Decision Support System to Optimize Spatial and Temporal Fuel Treatments at Landscape Scales. 4. Optimizing Spatial and Temporal Treatments to Maintain Effective Fire and Non-fire Fuels Treatments at Landscape Scales.	1. Poster presented at the 5th Biennial Lake Tahoe Basin Science Conference, Incline Village, NV, March 16-17, 2010. 2. Poster presented at AFE 4th International Congress on Fire Ecology & Management. Savannah, GA Nov 30- Dec 4, 2009. 3. Poster presented at IUFRO All-D3 Conference, Sapporo Japan, June 15-20, 2008. 4. Poster presented at International Mountain Logging and 13th Pacific Northwest Skyline Symposium, Corvallis OR April 1-6 2007.

	5. Optimizing Spatial and Temporal Treatments to Maintain Effective Fire and Non-fire Fuels Treatments at Landscape Scales	5. Poster presented at 2nd Fire Behavior and Fuels Conference, Destin, FL March 26-30, 2007

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ATTACHMENT L

EXHIBIT F

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Effects of fuel spatial distribution on wildland fire behaviour

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Abstract. The distribution of fuels is recognised as a key driver of wildland fire behaviour. However, our understanding of how fuel density heterogeneity affects fire behaviour is limited because of the challenges associated with experiments that isolate fuel heterogeneity from other factors. Advances in fire behaviour modelling and computational resources provide a means to explore fire behaviour responses to fuel heterogeneity. Using an ensemble approach to simulate fire behaviour in a coupled fire–atmosphere model, we systematically tested how fuel density fidelity and heterogeneity shape effective wind characteristics that ultimately affect fire behaviour. Results showed that with increased fuel density fidelity and heterogeneity, fire spread and area burned decreased owing to a combination of fuel discontinuities and increased fine-scale turbulent wind structures that blocked forward fire spread. However, at large characteristic length scales of spatial fuel density, the fire spread and area burned increased because local fuel discontinuity decreased, and wind entrainment into the forest canopy maintained near-surface wind speeds that drove forward fire spread. These results demonstrate the importance of incorporating high-resolution fuel fidelity and heterogeneity information to capture effective wind conditions that improve fire behaviour forecasts.

Keywords: fire behaviour modelling, fuel classification, fuel representation, wind response.

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Introduction

It is exceedingly difficult to know *a priori* if a wildland fire will extinguish, or spread and contribute to the annual 36 to 46 million km^2 burned globally (Doerr and Santín 2016). Nevertheless, this knowledge is critical for forecasting if a wildland fire will meet management targets or for guiding management response to fires that endanger lives and property. A combination of environmental factors – including wind, topography, fuel moisture, and the amount and arrangement of fuel – determine wildland fire behaviour. For example, the spatial distribution of fuel heterogeneity, which determines the arrangement of combustible material and local wind flows, significantly influences fire behaviour (Turner and Romme 1994; Finney 2001; Knapp and Keeley 2006; Parsons *et al.* 2017). Simulated wind conditions, coupled to fire interacting with heterogeneous forest canopies, show that fire behaviour is affected by fuel structure (Pimont *et al.* 2011; Linn *et al.* 2013; Hoffman *et al.* 2015; Parsons *et al.* 2017; Ziegler *et al.* 2017). However, studies that systematically characterise the sensitivity of fire behaviour to fuel heterogeneity are absent owing to poorly described fuel conditions and computational or experimental costs. Therefore, the response of fire behaviour to fuel arrangement remains poorly quantified, which limits estimates of fire outcomes.

Over the past two decades, a growing breadth of fire scenarios – ranging from prescribed fires in marginal conditions to high-intensity wildfires – and the increasing availability of computational resources have motivated the development of coupled fire–atmosphere models, such as WFDS (Mell *et al.* 2007, 2009; Bova *et al.* 2016), FIRESTAR3D (Frangieh *et al.* 2018; Morvan *et al.* 2018), FIRETEC (Linn 1997; Linn *et al.* 2002) and QUIC-Fire (Linn *et al.* 2020). These models resolve wind fields that are consistent with local heterogeneous vegetation structure and respond to dynamic two-way feedbacks between the fire and surrounding winds that compare well with observations (Linn and Cunningham 2005; Linn *et al.* 2012; Hoffman *et al.* 2016). By simulating wind flows and explicitly accounting for shear stress through canopy structures, including intermittent gusts and lulls that result from gaps between groups of trees (Pimont *et al.* 2009), fire

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behaviour simulations respond to the aerodynamic influences of canopy structure and the spatial heterogeneity of vegetation and buoyant heat from combustion. Although many of these models are too computationally expensive for operational use, they allow a fully three-dimensional description of the forest. The development of this class of models now lets us test how sensitive simulated fire behaviour is to representation of fuel and the characterisations of fuel heterogeneity, especially for low-intensity fires that are more sensitive to fuel arrangement compared with high-intensity fires (Clements *et al.* 2016).

Discontinuities in the horizontal distribution of canopy fuels associated with large-scale heterogeneities create wind patterns (Dupont and Brunet 2007) that influence fire behaviour. Forest structure affects the fire environment by determining: (1) the distribution of combustible material; (2) the ambient flow patterns through and around vegetation (Gao and Shaw 1989; Finnigan 2000; Pimont *et al.* 2011); and (3) the response of winds to the heat released during the fire (Kiefer *et al.* 2018). Canopy heterogeneity increases the spatial and temporal variation in the wind field within and just above the canopy, with the intermittent sweeping of fast-moving air down into the canopy and the ejection of slow-moving air upward out of the canopy (Kiefer *et al.* 2016; Kiefer *et al.* 2018; Moon *et al.* 2019). The aggregated effects of this turbulence alter the mean wind shear above (Dupont and Brunet 2008), within and below the canopy. Likewise, the distribution of fuels influences the spatial patterns of winds that can be drawn in by the fire and fire-influenced winds that feed back to fire behaviour (Kiefer *et al.* 2018).

Variability in wind conditions associated with boundary-layer turbulence and wind–canopy interaction is recognised as a chief contributor to uncertainty in fire behaviour (Burrows *et al.* 2000; Sun *et al.* 2009; Linn *et al.* 2012; Pinto *et al.* 2016; Benali *et al.* 2017). Atmospheric turbulence is amplified when winds interact with fire (Clements *et al.* 2008), increasing uncertainties in fire behaviour simulations, especially under marginal fire conditions (Hiers *et al.* 2020) when fire-influenced winds are significantly stronger than ambient winds. This complicates the ability to measure how forest heterogeneity interacts with fire-influenced winds to affect fire behaviour.

Given the influence of canopy structure on ambient and fire-induced winds, it is essential to explicitly account for the effects of canopy structure when exploring the interaction between forest structure and fire behaviour (Hilton *et al.* 2015). Nevertheless, the effects of forest heterogeneity on the variability of fire behaviour have not been quantified adequately (Parsons *et al.* 2017) because few studies systematically account for increasing levels of fuel variability. Therefore, a generalised understanding of how spatial fuel characterisation determines fire behaviour is lacking. By identifying how fuel heterogeneity influences fire behaviour and describing essential aspects of fuel heterogeneity, simulated uncertainty and fire behaviour variability can be constrained.

To determine the influence of vegetation structure on fire behaviour, an analysis of ensembles of simulations is required to avoid confounding mean behaviour with the influences of site and moment-specific conditions (Parsons *et al.* 2017). Fire behaviour at a specific location in time and space is a function of the site and moment-specific environmental conditions, including the local arrangement of fuels and timing of gusts relative to the fire's arrival at that location. The absence of precise knowledge of fuel locations or relative timing of fires and wind events limits predictability (Pimont *et al.* 2017). Ensembles of vegetation scenarios with the same macro-scale characteristics (e.g. canopy bulk density) but different fine-scale characteristics (e.g. the position of individual trees) can help (1) determine the sensitivity of fire behaviour to fine-scale fuel characteristics, and (2) quantify the uncertainty associated with fire behaviour forecasts. By performing ensemble simulations with a physics-based model of combined dynamic winds and fire behaviour, we can quantify both the mean and variability in fire behaviour associated with macro-scale fuel heterogeneity. Likewise, an ensemble approach provides a measure of fire behaviour uncertainty within constrained conditions (Pinto *et al.* 2016) that can inform fuel management planning and risk assessment frameworks for operational use (Ager *et al.* 2011; Finney *et al.* 2011). Increasingly, probabilistic ensemble methods have also been shown to elicit fundamental behaviour within complex fire models that account for non-linear processes (Cruz and Alexander 2017). To discern fire behaviour sensitivity to details of fuel heterogeneity, ensembles of multiple fuel beds that have the same domain fuel load and spatial characterisation of the variance of fuel density are required. Here, we investigated the sensitivity of fire behaviour simulations in FIRETEC to spatial characterisation of fuel arrangement. Virtual canopies with the same macro-scale characteristics but different degrees of detail in representation were developed to perform ensemble fire behaviour simulations.

Methodology

We used FIRETEC, a mechanistic fire–atmosphere model, to investigate how the representation and heterogeneity of fuel influence simulated fire behaviour. We generated ensembles of virtual forest canopies based on field measurements from a 50 × 20-m ponderosa pine (*Pinus ponderosa*)-dominated plot near Flagstaff, AZ, with 860 trees ha^{-1}, a mean diameter at breast height (DBH) of 23 cm and a mean tree height of 14 m (Linn *et al.* 2005). Each ensemble features identical macro-scale characteristics, including domain average and vertical profiles of fuel density (0.083 kg m^{-3}) (Fig. 1, plot (*a*)), average tree height, and average height to live crown, but with different variance and spatial characterisation of fuel conditions. We conducted a total of 101 simulations, including 20 replicates each of five different heterogeneous fuel distributions, and an unreplicated simulation with a homogeneous fuel distribution (Average Fuel). We explored the spectrum of fuel fidelity starting with the low-fidelity homogeneous or Average Fuel case. The five heterogeneous fuel scenarios represent a stepwise increase in fuel fidelity and length scales of fuel heterogeneity representation. They are: (1) Average Tree, with one representative tree randomly replicated across the domain (no difference between trees); (2) Forest Data, with variable trees, whose attributes match field data, randomly placed across the domain; (3) 15-m Gaps, with the same fuel fidelity as Forest Data, but with trees aggregated to create 15-m gaps; (4) 30-m Gaps, same as Forest Data, with trees aggregated to create 30-m gaps, and (5) 45-m Gaps, same as Forest Data, with trees aggregated to create 45-m gaps. In each simulation, the total fuel load was held constant, and only the

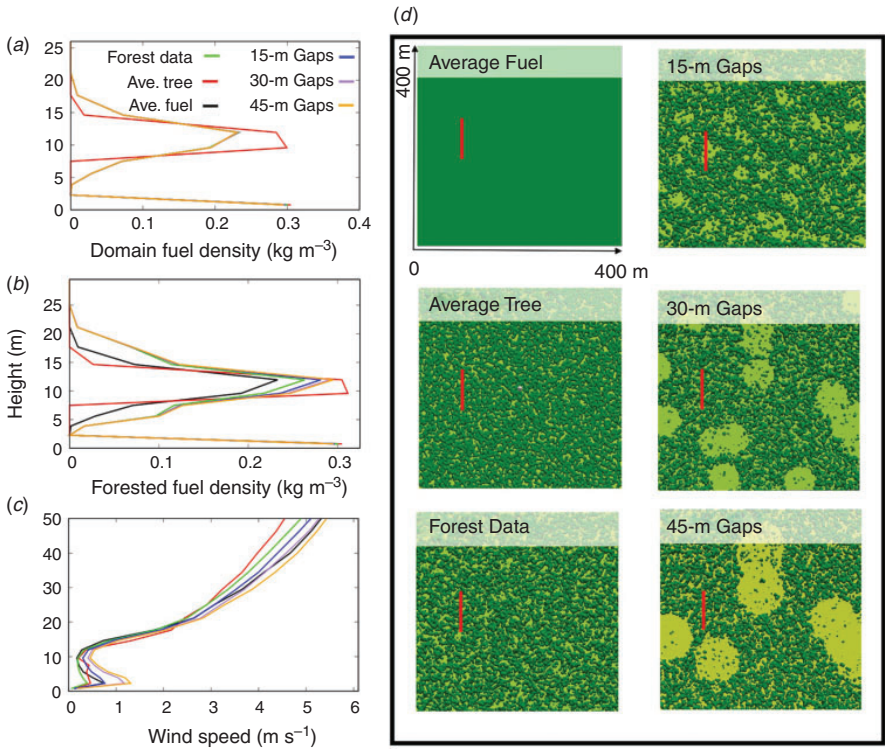

Fig. 1. (*a*) Domain-average vertical fuel density profiles for each ensemble; note that all ensembles except Ave. Tree overlap. (*b*) Vertical fuel density profiles averaged over areas with canopy fuel densities above zero. Note that excluding areas where vertical fuel density equalled zero resulted in a gradation of fuel density with increased fuel variance. Domain fuel density equalled 0.083 kg m^{-3} for all ensembles, and variation of canopy fuel density plotted was due to differences in tree density for the areas with trees. (*c*) Ensemble-average *u* wind (streamwise velocity) profiles to 50 m above the surface before ignition. (*d*) Example fuel domains for each of the six ensembles. Red lines denote the fire ignition locations.

Table 1. Domain fuel load characteristics

Representation class (Ensemble)	Fuel density variance	Fuel density correlation length (m)
Average Fuel	0	0
Average Tree (1)	0.188	1
Forest Data (2)	0.299	2
15-m Gaps (3)	0.359	10
30-m Gaps (4)	0.364	27
45-m Gaps (5)	0.377	40

arrangement of the trees was altered. The 20 replicates were developed by rerandomising tree and gap locations. All simulations were performed in 400 × 400-m domains with 2-m horizontal discretisation to a height of 600 m. Domain fuel density was defined as the total mass of fuel within the 160 000-m^2 domain between the ground and 22.9 m, top of the highest cell containing fuel. We established a gradient of fuel density variability between the ensembles, starting with 0 (kg m^{-3})^2 for the Average Fuel ensemble and increasing to 0.377 (kg m^{-3})^2 for the 45-m Gap ensemble (Table 1). Likewise, there was a gradient of increasing lengths at which deviations from the local fuel load were no longer similar (correlation lengths).

We developed a different 3D fuel density arrangement for each replicate within each ensemble using values for tree height, crown radius and height to live crown obtained from data. For the Forest Data ensemble, the distribution of fine fuel in the canopy was parameterised following the methods outlined by Linn *et al.* (2005), where sampled trees and their dimensions were randomly placed throughout the domain to maintain observed stem density and forest characteristics. We developed the Average Tree virtual forest realisations by first estimating the mean tree height, height to live crown and crown circumference, and then randomly populating the domain with trees that had these properties. Note that populating the domain with a single-tree representation resulted in slightly different vertical profiles of fuel density (Fig. 1*a*). To develop the Average Fuel realisation, we computed the vertical distribution of fuel by horizontally averaging every vertical layer in the Forest Data domains. This vertical distribution was then applied to every *x* and *y* location to establish a horizontally homogeneous forest with the same vertical distribution of fuel density as for the

Forest Data cases. Because there was no spatial variation in the Average Fuel realisation, only one ensemble member was used. For the 15-, 30- and 45-m Gap ensembles, we randomly selected locations for gap creation. All trees within the gap were then moved to a new random location, which might be placed back in the gaps, thus ensuring that the overall fuel load and canopy density was maintained among ensembles. This approach effectively decreased the fuel density within the designated patches and increased the fuel density in other areas (Fig. 1*b*), which mimics the structure found in forests with natural disturbances (Lindenmayer and Franklin 2002; Mitchell *et al.* 2006).

We parameterised surface fuels assuming that grass dominates in the spaces between trees, and litter accumulates and diminishes grass loads beneath trees. We used a grass fuel density of 0.35 kg m^{-3}, which had a height of 0.7 m, and a litter fuel density of 0.5 kg m^{-3}, which had a maximum litter depth of 10 cm under dense trees. The spatial distribution of grass and litter contributed to the overall domain fuel density variance and spatial gradients of fuel density variance. As described in Linn *et al.* (2005), the total fuel loads in surface cells included contributions from grass, litter, and short trees that reached into the lowest computational cell. The aggregated fuel properties of the combined surface fuels (e.g. moisture and height) were determined via a mass-weighted average. We observed no difference in domain surface fuel density between ensembles (Fig. 1*a*; all lines overlap below 2 m).

Fire simulations

To represent wind conditions characteristic of a given ensemble, turbulent structures need to develop in response to the simulated forest structure from an initial inflow boundary condition, which generally requires simulations to include a long fetch area. To reduce the size of the computational domain, we used the methodology described in Pimont *et al.* (2020). A large-scale pressure gradient force and cyclic boundary conditions, where winds exiting the domain are cycled back as inflow into the domain, create the long fetch necessary for turbulence to adjust to the ensemble fuel structure. This results in turbulent structures evolving within the model domain to be spun up and used as inflow boundary conditions during the fire simulation. We developed ensemble-specific wind fields using a single representative fuel arrangement for each ensemble. A 3-m s^{-1} streamwise wind speed (u) was specified at 25 m above the ground, ~10 m above the canopy that accompanied an initial log profile wind speed with height. This fairly low wind speed was chosen to represent marginal fire spread conditions. The winds and turbulence were spun up in this manner for 500 s, at which time the mean vertical velocity profile and the turbulence profiles ceased to change with time. Using the cyclic boundary condition mode, we simulated turbulent winds for each ensemble type for an additional 20 min as forcing conditions for the combustion simulations.

Each realisation within a given ensemble used the same representative forcing conditions but resulted in different wind profiles, as determined by the specific drag imparted by the characteristic spatial fuel arrangement of that ensemble (Fig. 1). These forcing conditions were applied for an additional 400 s before the time of ignition so that the flow field could adjust to the specific vegetation distribution. Ignition in each simulation was achieved by bringing surface and canopy fuels up to combustion temperatures (1000 K) for 3 s in a 100-m-long and 4-m-deep rectangular area located 100 m from the upwind domain boundary. The idealised ignition method is intended to ensure each realisation starts with a similar region of combustion. Not including the model spin up, each realisation required 64 processors and 16 h of wall-clock time to simulate combustion, resulting in 103 524 CPU hours for all combustion simulations. Spinning up wind fields for all ensembles required an additional 12 288 CPU hours.

Fire and wind behaviour metrics

For each ensemble and realisation, we calculated the forward rate of fire spread, heat release per unit area and the total area burned. We calculated the spread distance for each fire to be the farthest distance of the fire front from the ignition line along the streamwise wind direction (u) and plotted it against time to evaluate the forward rate of fire spread. Heat release per unit area is the total amount of energy released by combustion per second divided by the area of the fire, and therefore has units of kilowatts per metre squared. The area burned was estimated as the total area of the domain where combustion (i.e. loss of fuel mass) occurred projected onto a 2D plane. We quantified domain wind conditions in terms of turbulence kinetic energy (TKE), which is a measure of the energy associated with fluctuations in the wind field shear stress. TKE was calculated by summing the variances of the directional wind component:

$$\mathrm{TKE} = \frac{1}{2}((u'u') + (v'v') + (w'w')) \quad (1)$$

where:

$$u'u' = \frac{1}{t}\int_0^t \left(u_{(t,i,j)} - \overline{u}_{(i,j)}\right)^2 dt$$

$$v'v' = \frac{1}{t}\int_0^t \left(v_{(t,i,j)} - \overline{v}_{(i,j)}\right)^2 dt \quad (2)$$

$$w'w' = \frac{1}{t}\int_0^t \left(w_{(t,i,j)} - \overline{w}_{(i,j)}\right)^2 dt$$

Here, u is the streamwise horizontal wind component, v is the cross-stream horizontal wind component, w is the vertical wind component, i and j are the indices of specific cells, and t is the time index.

Results and discussion

The Average Fuel simulation had the greatest forward spread, heat release rate per unit area and area burned (Fig. 2). The Average Tree ensemble with randomly placed trees slowed the forward spread and decreased fire intensity compared with the Average Fuel simulation. Increasing the level of detail in the representation of fuels resulted in added variations in fuel density, such as small gaps between trees that caused the fire to slow and reduced heat per unit area. Likewise,

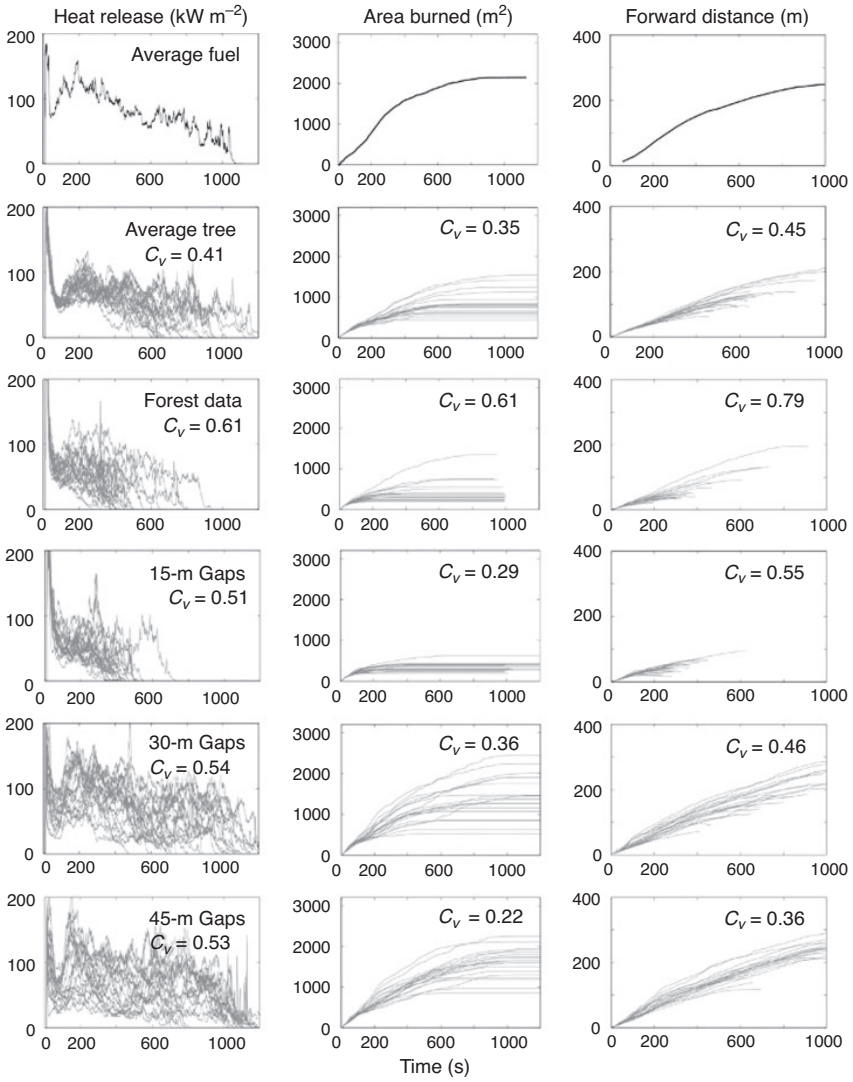

Fig. 2. Time series of fire intensity (left), area burned (centre), and forward progress of fire (right) highlight variability in fire metrics for all ensembles except for Average Fuel, which only has one ensemble member. The coefficient of variation, $C_v = \frac{\sigma}{\overline{X}}$ (σ is the standard deviation and $\overline{X}$ is the mean), is also provided for each ensemble.

increasing the variation of sizes and shapes of trees to that of the Forest Data and 15-m Gap ensembles further reduced heat released, rate of spread and area burned. Conversely, increasing local canopy density and the length scale of sparse forest gaps from the 15-m to the 30- and 45-m ensembles resulted in simulated fire behaviour metrics to rebound compared with the simulated results of the Average Tree, Forest Data and 15-m Gap ensembles. The increase in fire behaviour metrics for the 30- and 45-m Gap ensembles demonstrates that increasing variability in spatial fuel density does not necessarily act to slow fire progression and that fire behaviour is a result of complex interactions with fuel structure.

Ensemble results (Fig. 2) show a range of fire outcomes within each characteristic fuel representation, except for the Average Fuel simulation, which did not have any replicates. The range in fire behaviour outcomes for each ensemble was determined by the variation between details of specific fuel representations, fuel arrangement for given realisations and the associated wind variability. Interestingly, the range in fire behaviour metrics did not increase along the gradient of fuel density variability because the Forest Data and the 15-m Gap ensembles generally did not propagate fire and extinguished quickly. However, when scaled by the mean fire behaviour, the coefficient of variability for the Forest Data remained high.

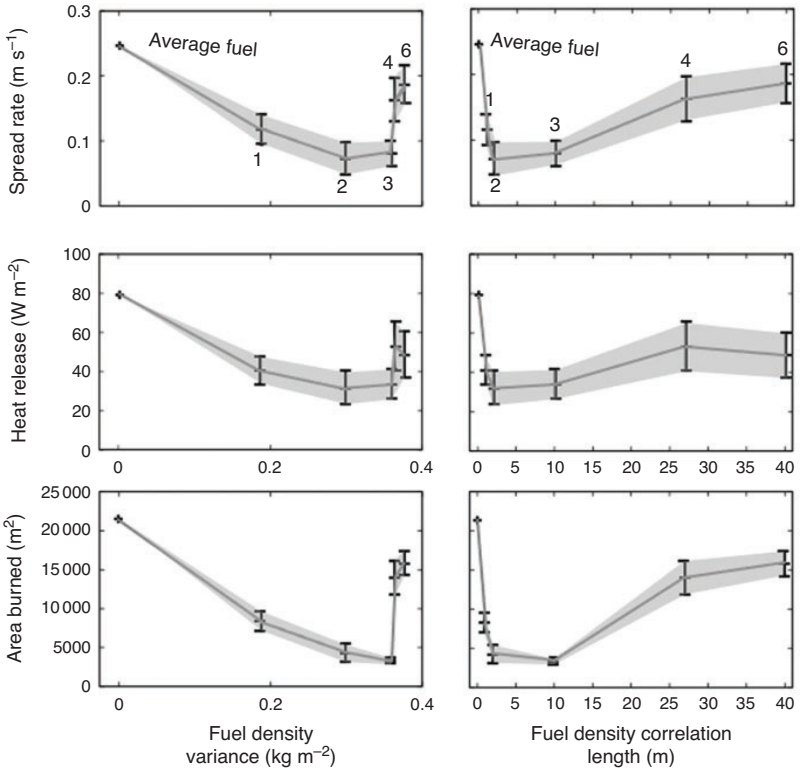

Fig. 3. Mean and the 95th confidence interval of spread rate, heat release rate, and area burned for each ensemble plotted against variation in fuel density and correlation length of fuel density. Numbered ensembles are cross-referenced in Table 1.

Furthermore, one Forest Data realisation carried 200 m, which contributed to the observed variability in that ensemble (Fig. 2). This suggested that while there is a high probability that fires in the Forest Data ensemble will not spread under the conditions simulated, there is also the possibility that some fires will act outside the ensemble characteristic. Similarly, the large fuel density correlation lengths in the large-gap ensembles also contributed to variability in fire size and behaviour, similar to what Parsons *et al.* (2017) observed.

Emergent fire behaviour from characteristic fuel variability

Differences between ensembles indicated that both the representation and heterogeneity of fuel density influenced fire behaviour. How fuel arrangement characteristics influenced probable fire behaviour in these marginal conditions was shown by plotting summarised fire behaviour metrics for each ensemble against the domain variance of fuel density and the correlation length of that variability (Fig. 3). As fuel density variability increased, all fire behaviour metrics (forward spread, heat released and area burned) decreased linearly for correlation lengths less than 10 m. However, as the correlation length of fuel density increased beyond 10 m, the fire behaviour metrics rebounded (Fig. 3). In the 30- and 45-m Gap ensembles, which correspond to correlation lengths of 27 and 40 m respectively, all fire behaviour metrics increased compared with the other ensembles except for the Average Fuel case. The 45-m Gap ensemble had slightly greater spread rates and area burned than the 30-m Gap ensemble, whereas the 30-m Gap ensemble had a slightly greater heat release. However, these changes were also associated with an increased variance for both the 30- and 45-m Gap ensembles, and distinguishing ensemble trends from each other was difficult.

These results have three implications for simulating fires in a forest with heterogeneous fuels using process-based modelling: (1) there can be significant differences associated with representing the canopy and surface fuels as a homogeneous layer for ecosystems that naturally include gaps between trees; (2) the variability between sizes and shapes of trees in the forest can have significant impacts on fire behaviour by slowing spread; and (3) the length scales of heterogeneity in fuel density also influenced fire behaviour, where length scales greater than 10 m increased rate of spread and area burned. The sensitivity of fire behaviour to fuel fidelity and variability highlighted in these results suggests the need for increased fuel description detail. Historically, fuels were characterised using stand-scale spatially averaged descriptors (i.e. canopy bulk density, canopy base height), often without considering the within-stand variability (Hoffman *et al.* 2016). However, rapidly evolving remote sensing and machine learning techniques can now characterise three-dimensional fuel structure, including tree-scale spatial

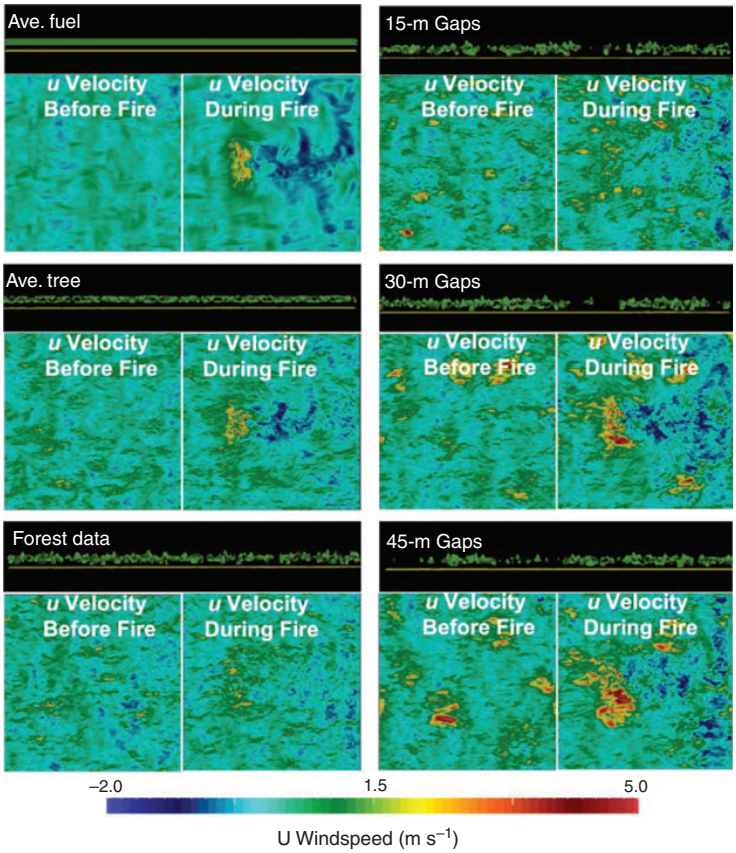

Fig. 4. Horizontal fuel profiles from a sample realisation of each ensemble, a *u* velocity snapshot at mid-canopy height (11 m) before ignition and after ignition showing the interaction of wind flow with the fire. Note the disaggregated *u* velocities in the Forest Data and 15-m Gaps ensembles.

heterogeneity (Liao *et al.* 2018; Massetti *et al.* 2019; Narine *et al.* 2019) and three-dimensional below-canopy fuel density (Hudak *et al.* 2020). Furthermore, the ability to quantify fuel structure and model physically based fire dynamics motivates an in-depth understanding of the three-dimensional wind and fuel interactions that influence fire behaviour. Combining three-dimensional wind and fuel interactions with quickly assessed remote sensing and machine learning techniques could increase the application and accuracy of data-driven wildfire models (Coen and Schroeder 2013; Coen *et al.* 2013).

Influence of changing the level of detail in fuels descriptions

The Average Fuel realisation had the least amount of fuel detail, where the horizontal fuel mass was spread evenly, creating a continuous layer of low-density fuel rather than individual trees. Conversely, when representing individual trees, the same amount of canopy mass was concentrated into localised areas – 'trees' – leaving gaps in the canopy. Similarly, surface fuel also shifted to denser litter under trees and less dense grass in spaces between trees. Gaps between trees acted as barriers to crown fire spread, which required stronger and more consistent local winds to bridge the gaps. Additionally, the representation of individual trees and litter, in which the fuel density was higher than in the homogenised Average Fuel, slowed fire spread because it took longer to consume fuels of higher densities and push forward spread, behaviour previously observed by Pimont *et al.* (2006). Areas with higher fuel densities also released more heat, resulting in a stronger local vertical motion, which, coupled with longer combustion residence time, resulted in longer periods of updrafts that impeded the forward propagation due to winds in the along-stream direction.

Canopy structure impacted winds because randomly arranged trees imposed variable aerodynamic drag. It is not surprising that winds would be slower within or right behind dense vegetation compared with lower-density vegetation. Although there were gaps in the Average Tree canopy, those gaps were not large enough for the wind to efficiently penetrate and reestablish, and thus the average wind speeds within the canopy were lower (Fig. 1). The lower wind speed within the canopy combined with canopy gaps and higher localised fuel densities of trees all worked to slow or stop canopy fire spread because the weak winds could not push the simulated fire across

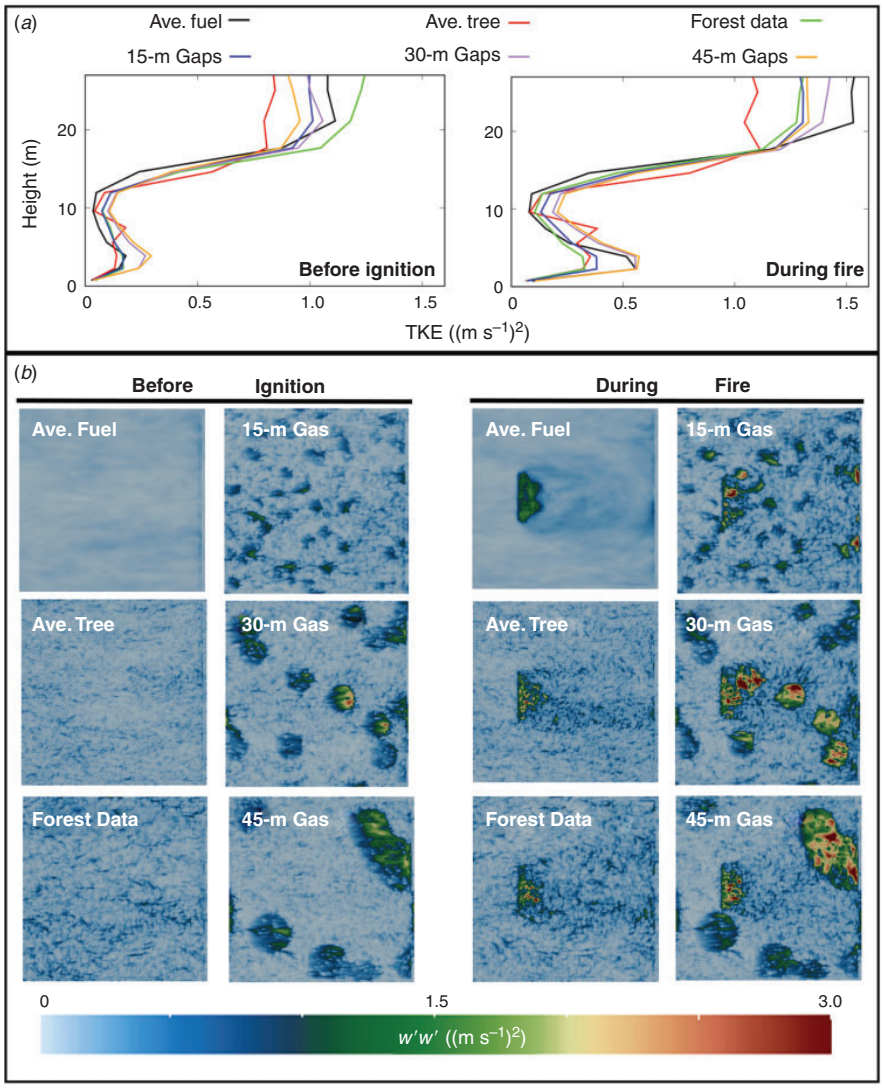

Fig. 5. Average turbulent kinetic energy (TKE) for the 2.5 min before the time of ignition is plotted on the left in panel (*a*) and the average TKE for the 2.5 min after ignition on the right of panel (*a*). Panel (*b*) shows the average $w'w'$ magnitude for the 2.5 min before ignition (left) compared with the 2.5 min following ignition (right) at the mean canopy height of 10 m for a sample realisation from each ensemble.

the gaps and the buoyancy-induced flow was less likely to lean enough to the side to ignite a neighbouring tree.

Describing the variation among the trees

When considering differences between the Forest Data and Average Tree ensembles, the additional representation of fuel fidelity and therefore variation among trees resulted in a further decrease in fire spread, heat release per unit area and area burned. Using heterogeneous tree sizes and shapes meant trees were interacting with the wind field over a larger vertical extent than an averaged canopy or as a characteristic tree. This essentially broke up the larger-scale wind patterns into tree and gap-scale patterns. The level of explicit detail related to the canopy structure influenced simulated winds and turbulence; similarly to Boudreault *et al.* (2014), greater canopy representation resulted in a higher level of fine-scale turbulence (Fig. 4). For example, the presence of low hanging branches or smaller trees in the forest data ensemble disrupted dominant winds, especially near the surface, resulting in the lowest subcanopy wind speeds (Fig. 1*b*). Low wind speeds below the canopy hindered both surface and crown fire spread. Interestingly, complex canopy-driven disruptions to dominant wind flow were noticeable without fire as well as with fire when buoyant wind dynamics caused high-speed horizontal winds to feed the fire

from multiple directions (Fig. 4). These findings contrast with earlier studies that reported little change in overall turbulent kinetic energy associated with small-scale heterogeneity because vertical shear instabilities typically dominated (Patton 1997; Pimont *et al.* 2011). Our results suggest that even if the fine-scale turbulence was only a marginal contribution to the total kinetic energy budget, the turbulent features associated with small-scale heterogeneity can impact fire behaviour through their influence on both instantaneous local flows and reaction rates.

Influences of fuel density heterogeneity

The wind and fire behaviour also responded to a heterogeneous density of canopy fuel, suggesting that including canopy fuel heterogeneity in forest inventory databases or fuel class descriptions may help fire behaviour forecasts. The increased continuity of canopy fuel in densely forested regions and the increased surface and canopy wind speeds generated by the large gaps resulted in increased forward spread and area burned. The small distance between adjacent trees in aggregated canopies reduced the barriers to active crown fire spread. Likewise, surface fuel continuity increased with less-dense and faster-burning grasses. In addition, as canopy gap size increased, winds could penetrate through the canopy, resulting in increased wind velocity and fire spread.

Our results show that large openings in the canopy allow large-scale wind entrainment below the canopy, similarly to Dupont *et al.* (2011) and Pimont *et al.* (2011), and push the fire front along despite the increased fuel heterogeneity. To visualise how these openings allowed wind turbulence to pass vertically through the canopy, we examined the magnitude of the vertical variance of velocity ($w'w'$) 2.5 min before the fire was ignited and 2.5 min after ignition (Fig. 5). Using $w'w'$ allowed us to visualise the persistence of positive and negative vertical fluctuations from the mean and to identify areas of strong variations. The areas of large $w'w'$ corresponded to large canopy openings. Moreover, there was a larger increase of $w'w'$ and TKE during the fire (Fig. 5) for the 30- and 45-m Gap ensembles. Corresponding increases in $u'u$ and $v'v'$ (not shown) accompanied increases in $w'w'$. Large gaps in the canopy acted to increase wind entrainment, shear stress above the canopy shown as increased windspeed in Fig. 1*c*, and therefore TKE before and especially during combustion, thus allowing larger and consistent wind structures to interact with the fire (Fig. 5). This ability to move air in and out of the openings and an increase in the cross-stream wind turbulence ($v'v'$) also helped to maintain a larger fire line width (Hilton *et al.* 2015).

The non-monotonic relationship between correlation length of fuel variability and fire behaviour metrics, which rebounded at large length scales, illustrated that below a certain gap size, changes to canopy and subcanopy winds were not strong enough to change fire behaviour. Studies of wind interaction with forest canopies suggest that for winds to re-equilibrate to the absence of trees, a length of ~22 to 30 times the average canopy height is needed (Lee 2000; Pimont *et al.* 2018). To induce canopy and subcanopy turbulent wind structures, a length of 1 to 5 times the canopy height appears to be necessary (Pimont *et al.* 2011; Parsons *et al.* 2017). At 1.8 to 2.6 times the average canopy height, the 30- and 45-m Gap ensembles resulted in the canopy and subcanopy wind turbulence structures that influenced fire behaviour. In contrast, the ratio between gap length and canopy height for the 15-m Gap ensemble was not enough for the canopy and subcanopy turbulent winds to develop.

We note that we have focused on a ponderosa pine forest with circular canopy gaps of different sizes under low-velocity wind conditions, which demonstrated the dominant role that forest canopy heterogeneity has on effective wind conditions driving fire behaviour. However, many different forest types and conditions will likely impart unique signatures on fire behaviour such as the level of surface fuel homogenisation. A supplementary analysis (see supplementary material) comparing a homogenised surface fuel configuration with our heterogenous grass and litter surface fuel conditions demonstrates a strong influence of surface fuel conditions. Yet for our simulations, surface fuel homogeneity or heterogeneity does not significantly affect the relationship between fire behaviour metrics and fuel density variability or the length scales of that variability. We therefore hypothesise that fuel variability and the spatial length scales of that variability will influence fire behaviour in predictable ways. For example, greater wind velocities associated with more extreme burning conditions would dampen the effects of spatial variability on fire behaviour (e.g. Sieg *et al.* 2017). In contrast, increased canopy height could strengthen the relationship. Additionally, the overall domain canopy density could play a role in the strength of this relationship, where lower forest densities could weaken the effects of spatial fuel variability on fire behaviour.

Conclusions

We demonstrated that fuel variability and spatial characterisation of fuel density influenced simulated fire behaviour. Greater detail in fuel representation resulted in increasingly fine-scale wind discontinuities, which reduced fire spread and area burned. Likewise, when introducing variability in tree size and shape, the strength of fire behaviour metrics decreased. Spatial scales of fuel variability were also instrumental in the interaction of wind and fuel variability in determining fire spread. We observed a non-monotonic relationship between correlation length of fuel variability and fire metrics, all of which decreased with increasing correlation length up to 10 m but increased with correlation lengths above 10 m. Wind entrainment associated with large, sparse canopy patches resulted in both mean and localised wind speeds and faster fire spread. Furthermore, the turbulent wind conditions in large openings resulted in a disproportional increase in TKE and crosswinds that maintain fire line width.

The use of ensembles with equally probable spatial fuel distributions to characterise fire behaviour was necessary given the range of outcomes. Although mean behaviour for each ensemble was identified, significant overlap existed among individual realisations from different ensembles, highlighting the limitation of drawing conclusions from a single model realisation. Nevertheless, this research clearly shows how both the level of detail used to represent fuels and the inherent aggregation in canopy fuels influenced potential fire behaviour. Fuel characterisation that moves beyond spatially averaged descriptions to include increased spatial fidelity and effective wind description associated with characteristic fuel heterogeneity will better constrain fire behaviour uncertainty.

Conflicts of interest

The authors declare no conflicts of interest.

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EXHIBIT G

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Effects of canopy midstory management and fuel moisture on wildfire behavior

Tirtha Banerjee[1]✉, Warren Heilman[2,6], Scott Goodrick[3,6], J. Kevin Hiers[4,6] & Rod Linn[5,6]

Increasing trends in wildfire severity can partly be attributed to fire exclusion in the past century which led to higher fuel accumulation. Mechanical thinning and prescribed burns are effective techniques to manage fuel loads and to establish a higher degree of control over future fire risk, while restoring fire prone landscapes to their natural states of succession. However, given the complexity of interactions between fine scale fuel heterogeneity and wind, it is difficult to assess the success of thinning operations and prescribed burns. The present work addresses this issue systematically by simulating a simple fire line and propagating through a vegetative environment where the midstory has been cleared in different degrees, leading to a canopy with almost no midstory, another with a sparse midstory and another with a dense midstory. The simulations are conducted for these three canopies under two different conditions, where the fuel moisture is high and where it is low. These six sets of simulations show widely different fire behavior, in terms of fire intensity, spread rate and consumption. To understand the physical mechanisms that lead to these differences, detailed analyses are conducted to look at wind patterns, mean flow and turbulent fluxes of momentum and energy. The analyses also lead to improved understanding of processes leading to high intensity crowning behavior in presence of a dense midstory. Moreover, this work highlights the importance of considering fine scale fuel heterogeneity, seasonality, wind effects and the associated fire-canopy-atmosphere interactions while considering prescribed burns and forest management operations.

Increasing wildfire impacts has been documented over the past decades[1,2] and is projected to increase under climate change in the United States (US) and other parts of the world[1–8]. Apart from the changing patterns of precipitation, vapor pressure deficit and longer drought periods[7,9], an increasing trend of human habitation at the wildland-urban interface (WUI) has rendered the problem of wildfire management particularly complex. The WUI is the fastest growing land-use type in the US[10] and also poses significant wildfire threat in other countries such as Portugal. In the western US, about 50% of residential households are situated at the WUI, and flammable vegetation can come into close contact with infrastructure. This situation enhances the impact of wildfires, particularly with fast moving wildfires that escape efforts at containment during initial attack[11].

Successful suppression of small fires, called initial attack, is critical to limiting fire size, but successful suppression is increasingly difficult in the growing WUI. Mechanical thinning and prescribed burns are offered as effective techniques to decrease fuel loads and limit fire spread into communities[12,13]. However, given the complexity of interactions between fine scale fuel heterogeneity and wind, it has been difficult to assess the success of such management operations. Thinning forests may decrease fire intensity but also increase rates of spread during critical phases of initial attack under certain conditions[14–18]. Under extreme wind events such as those experienced in Paradise, California during the Camp Fire in 2018[19] or the south eastern Australian fires in 2019[20], fire behaviour in fuel treatments can be affected by fire-atmosphere interactions, affecting fire suppression outcomes.

The main factors that control the rapid expansion of small wildfires are the response times of fire crew, size of fire upon initiation of suppression action[21], and weather condition for that day. The removal of midstory and understory vegetation is targeted by managers to reduce wildfire intensity and decrease the probability of surface fire transitions to crown fire[22–25]. Thus, fuel treatment strategies focus on reduction of surface fuels, increasing the height to the live crown, decreasing crown density and a species-selective approach[12]. However, in order to assess the impact of fuel reduction treatments on fire behavior outcomes, one must consider the types of fuels,

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such as dead and live fuels, litter, ladder (midstory) fuels and canopy fuels associated with larger tress and their effects on fire behavior under different conditions of moisture levels[26].

The reduction of midstory and understory vegetation does not drive fire behavior in isolation. Depending upon the seasonality and fuel conditions, midstory vegetation can increase wind drag lowering wind speeds or increase fuel moisture, which each can slow fire spread or reduce intensity. Thus, to evaluate the efficacy of fuel treatments, fuel structure alone is insufficient to understand how treatments will alter future wildfire spread and suppression success[18,27–39]. To this effect, Bessie and Johnson[40] determined that local weather conditions, especially factors governing fuel moisture and wind speed are stronger indicators to determine fire behavior in vegetative fuel beds compared to stand age or species composition[41,42]. Keyes and Varner[43] recognized that higher wind speeds and turbulence in the sub canopy after thinning treatment might lead to higher mid-flame wind speeds, enhanced rates of spread and erratic fire behavior. Varner and Keyes[26] highlighted the importance of variations of fuel moisture and wind adjustment factors post fuel treatment in influencing fire spread and intensity. Moon et al.[44] studied sub canopy wind variations under a variety of fuel structures and called for further research into fire behavior under fuel treatment scenarios which incorporates the changes in wind among other factors post treatment. A broader discussion into sub-canopy changes under fuel treatment and associated fire behavior is beyond the scope of the current paper and the interested reader is referred to Banerjee[18] for a detailed review.

Beer[45] identified several mechanisms through which a fire propagates within a fuel bed. He also discussed the potential influence of coherent structures such as sweeps and ejections in a vegetation canopy where a surface fire burns the understory but the canopy crown remains unburnt. The fluctuations in vertical wind velocity generated by the fire can interact with these motions and help disperse heat to the unburnt fuel elements downstream of the flame sheet. Moreover, Cheney et al.[46] determined that while wind and dead moisture are important for grass fires, fuel load is the primary determinant of fire intensity. On the other hand, closed canopy forests with a higher moisture content and lower wind speeds can lead to lower intensity and slow moving fires[47]. Additionally, changing stand structure by thinning can lead to reduced torching and crowning potential[48,49]. Contreras et al.[50] used light detection and ranging (LiDAR) mapped forest structure data to characterize the role of vegetation connectivity and thinning operations (that reduce connectivity) in the context of crown fire potential. White et al.[51] and Davies et al.[52] determined that the flammability of surface fuels are also important in governing fire severity. The type of ignition is another factor that sets up the initial condition for fire propagation. Keeley and Syphard[53] identified the major wildfires in California from 2003 to 2018 and deduced that the fire regimes can be either identified as fuel dominated or wind dominated. In either case, the complex fire-fuel-atmosphere interaction is of critical importance.

Fuel moisture patterns in humid environments are more complex than previously assumed[54], and environmental conditions during a wildfire event may have non-linear treatment effectiveness outcomes. Finney et al.[55] identified the importance of studying turbulent flows associated with fuel structures and fuel moisture, especially how they contribute to buoyancy production and flow instabilities, but as yet, these complex coupled fire-atmospheric dynamics have not been applied to the question of fuel treatment effectiveness on initial attack success.

Computational fluid dynamic (CFD) modeling approaches are capable of representing the non-linear feedback between changes in forest structure, complex in stand flows, and fire behavior outcomes[56–64]. Pimont et al.[65] used FIRETEC to study the effect of different fuel treatments in the landscape on fire behavior. Linn et al.[66] used FIRETEC to model wind fields and fire propagation following bark beetle outbreaks. Kiefer et al.[67] studied the detailed budget of turbulent kinetic energy during a low intensity fire and investigated the sensitivity of mean and turbulent flows to canopy density as well as atmospheric stability using the ARPS-CANOPY model. Another series of studies[68–72] conducted detailed turbulence measurements during grass fires and surface understory fires using high frequency micrometeorological measurements from the FIREFLUX campaigns and two New Jersey Pine Barrens fire experiments.

However, there remains uncertainty regarding the complicated fire–atmosphere interaction in the canopy sub layer in presence of midstory vegetation of different densities, which governs fire spread in treated vs. untreated fuels. In this work, simulations using FIRETEC are used to address the following questions:

- What are the driving factors governing fire behavior under different levels of midstory management and fuel moisture?
- What are important factors leading to torching and crowning?
- How to characterize turbulent transport of momentum and energy to explain fundamental differences in fire behavior?

To answer these questions, specifically six sets of simulations are conducted. The cases are described in more detail in the methods section. The simulation cases are called dry no midstory (DN), dry sparse midstory (DS), dry dense midstory (DD), moist no midstory (MN), moist sparse midstory (MS) and moist dense midstory (MD), respectively. For brevity, these abbreviated forms will be used for further discussion. It is also important to note that the vegetation phenology in this study is driven by seasonality rather than atmospheric conditions.

Results

Burnt area. Figure 1 shows the burnt area after 520 s of fire propagation. Since the initial and boundary conditions are same for all the simulations, the differences in fire spread are entirely due to differences in canopy structure among the different cases. For the dry scenario, the DN case and the DD case have burnt areas of similar sizes, although the burn scar shapes are slightly different. The DS case has a smaller and thinner burn area. For the moist scenario, the MN case has the largest burn area. The size of the burn area is smaller for the MS and smallest for the MD case. Figure 1 highlights a crucial factor—namely the competing influences of fuel avail-

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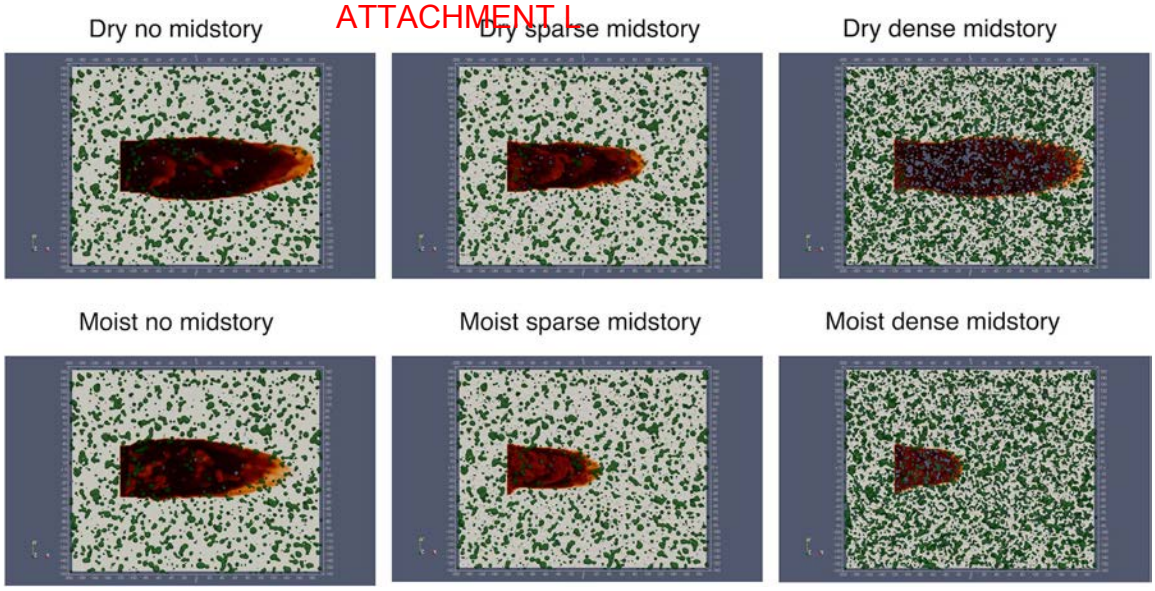

Figure 1. Burnt area after 520 s for different cases. Green depicts midstory vegetation, the light yellow shade depicts the ground surface covered with grass and litter and the dark color depicts burned area.

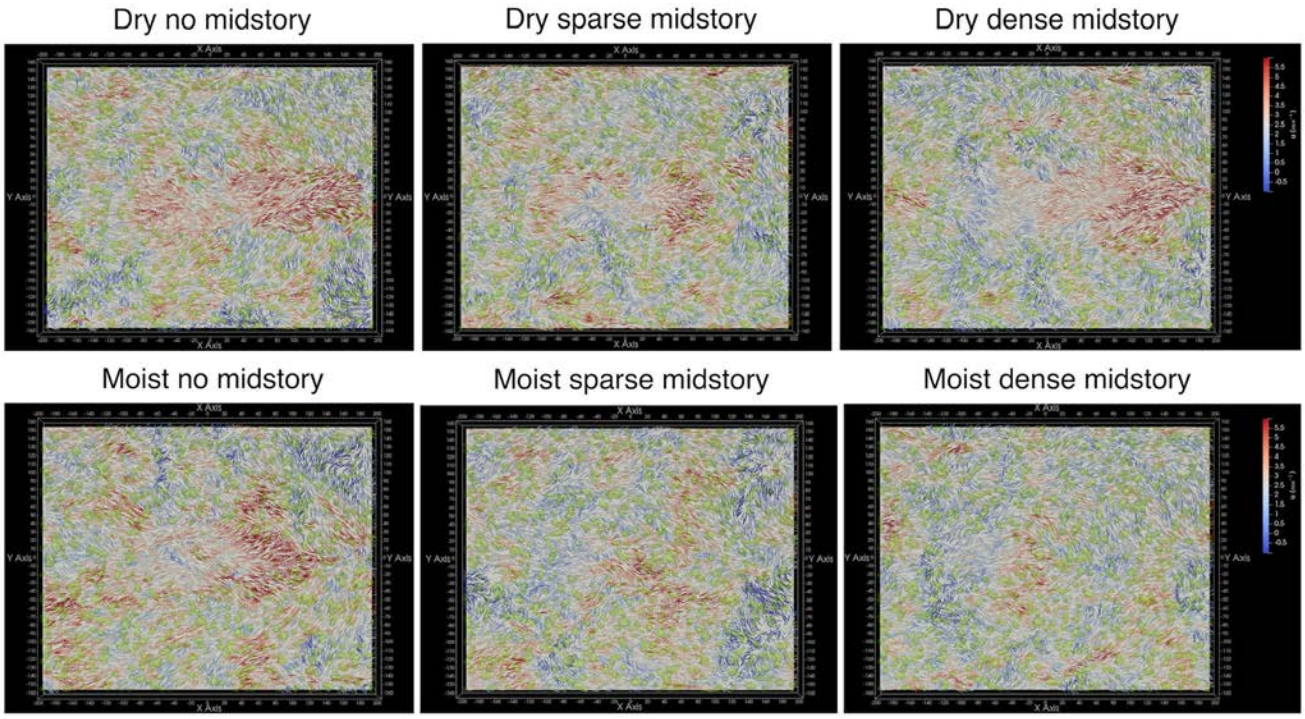

Figure 2. Sub canopy wind field ($x - y$ plane at 7 m height) with arrows colored by instantaneous streamwise velocity component (u) after 520 s for the six scenarios.

ability, fuel moisture and wind effects. Under dry conditions, the availability of dry fuels in the DD case creates a strong head fire. However, the DN case is characterized by a stronger wind field inside the canopy due to lower vegetative drag. This indicates that there is likely a threshold effect, where either the fuel availability or the wind effects dominate. The DS case falls in the intermediate regime, and consequently has a smaller burn scar. Under moist conditions, the higher fuel moisture dampens the effect of fuel availability on fire propagation, and thus the wind effect dominates. This fact is highlighted in Fig. 2, which plots the horizontal ($x - y$) wind field at 7 m height, with velocity vectors colored by the streamwise velocity component (u). As observed, the no midstory case has higher wind speeds compared to the other cases due to lower vegetative drag. A more quantitative understanding of the role of turbulence will be discussed in a subsequent section.

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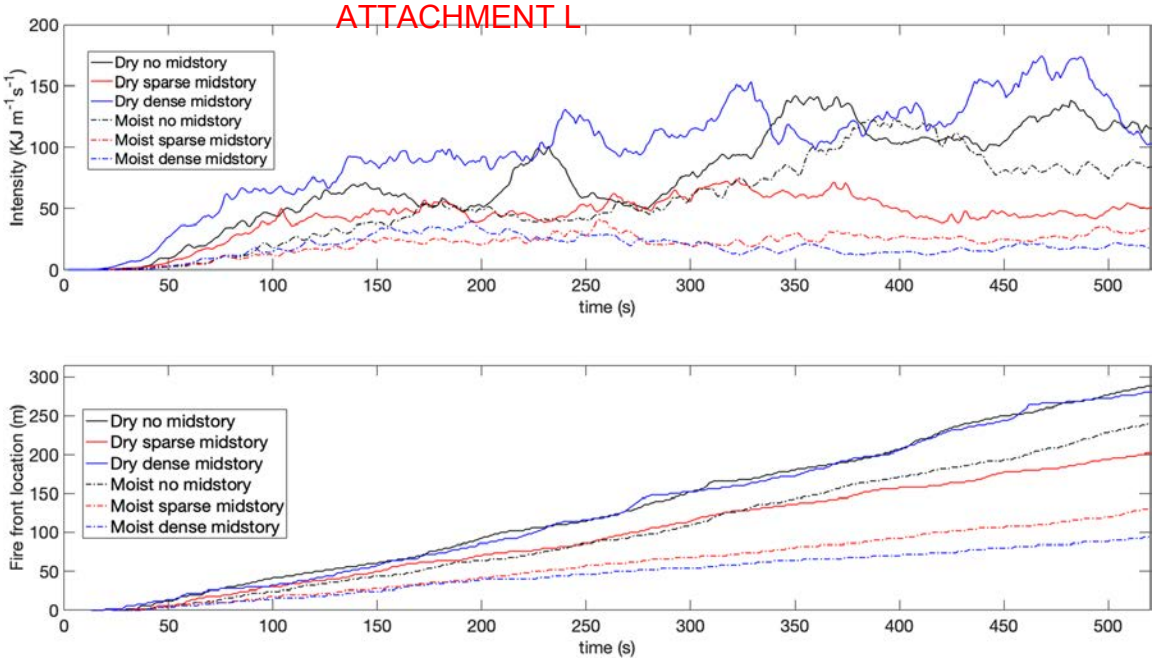

Figure 3. Burning intensity (top) and fire front location with respect to time (bottom) for different cases. The black lines indicate non midstory cases, the red lines indicate the sparse midstory cases and the blue lines indicate the dense midstory cases. The solid lines indicate dry scenarios and the dash dotted lines indicate moist scenarios.

Fire intensity, fire spread and fuel consumption. Figure 3 shows burning intensity (top panel) and the location of the fire front (bottom panel) with respect to time. As observed, the DD case has the highest intensity because of elevated fuel availability among all cases. Interestingly the DN case burns more intensely compared to the DS case, highlighting the critical interaction between fuel availability and wind effects. The moist cases generally showed reduced fire intensity than the dry cases as expected. The differences among the fire intensities observed within the moist cases are smaller than those among the dry cases. This implies the absence of any critical behavior feedback for the moist cases with respect to the competition between wind effects and fuel availability and the dominance of wind effects for the moist scenarios.

Interestingly the fire front propagation spread rate follows the trend of the intensities. However the difference between the cases do not follow the trend in differences of fire intensity. The DN and DD cases have similar spread rates and these two cases show the fastest fire front propagation, although the DN case is slightly faster. The reason for this behavior is likely the same—one dominated by dry fuel availability and the other by strong winds. The effect of the wind prevails for the moist cases as well and the MN case is faster than the MS and MD cases. To summarize, it can be stated that fire intensity is strongly governed by fuel availability and fire propagation speed is governed by wind effects. However, fuel moisture significantly reduces both fire intensity and rate of spread. This is partly because fire induces its own wind environment as well. However, under drier scenarios the effect of vegetative drag becomes more evident.

Figure 4 shows the consumption of canopy overstory fuels (top panels) and canopy midstory and understory fuels (bottom panels) after 520 s. The left panels shows the actual amount of fuel remaining over time in metric tons (kg multiplied by 1000) for the entire domain (12.8 ha), the middle panels show the percentage consumption and the right panels show the rate of consumption per second. Any vegetation below 5 m height is considered midstory and understory vegetation. Note that all cases start with the same amount of overstory fuel (35 metric tons). As the leftmost bottom panel shows, the dense midstory cases have about 35 metric tons of midstory and understory fuels, although the moist case has slightly more fuel, as expected, since the deciduous midstory seasonally loses leaf biomass. The sparse midstory case has about 27 metric tons midstory and understory fuels in the moist season and about 26 metric tons in the dry season. The no midstory case has about 22 metric tons of understory fuels, and that amount does not vary in the dry and moist seasons.

A few observations can be made from Fig. 4:

- **Net consumption** The net consumption for the overstory is highest for the DD case, about 40%. The DN case has a similar consumption rate—about 30%. Interestingly, both the dry dense and DN cases have about 45% consumption for the mid and understory fuels. This indicates that while crowning happens for both these cases, driven by the dry fuels and higher winds, the presence of midstory and understory fuels influence how much overstory fuel the crown fire consumes. Moreover, the MN case has about 25% consumption for the overstory fuel and 35% consumption for the mid and understory fuels. The fact that the MN case has more consumption than the DS case is also highlights that wind effects can dominate over moisture effects.

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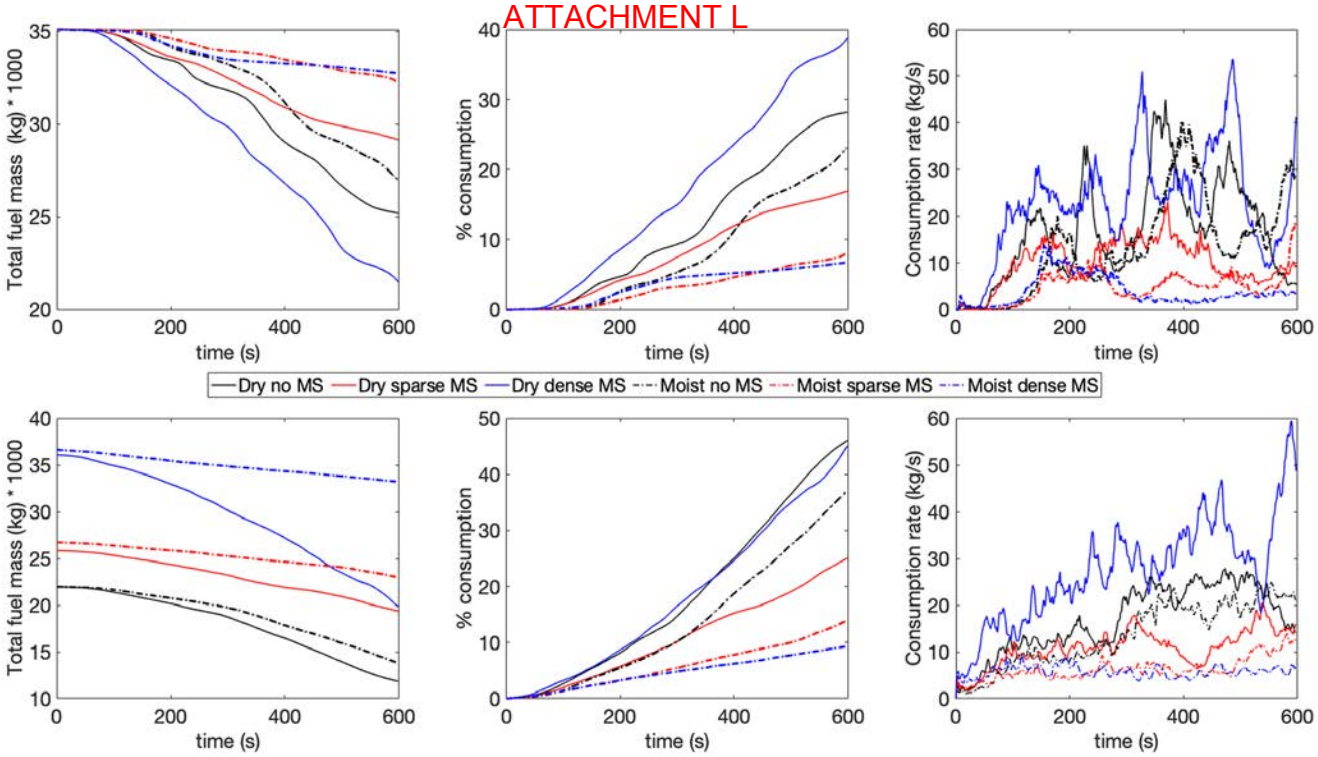

Figure 4. Actual fuel amount remaining over time (left), percentage consumption (middle) and rate of consumption (right) of fuel elements with respect to time for different cases. Line styles are same as Fig. 3. The top row shows the quantities for the overstory and the bottom row for the midstory and understory combined.

- **Difference based on fuel moisture** The dry fuels are always consumed more than moist fuels, as expected, both for overstory and understory vegetation. The difference between dry and moist scenarios is most prominent for the dense midstory cases—about 35% more overstory and about 40% more mid and understory fuels are consumed in the dry condition compared to the moist condition, highlighting the importance of fuel moisture and seasonality in fire behavior. This difference is strikingly lower for the no midstory cases—about 5% for both overstory and mid/understory fuels. This indicates that when wind effects are more prominent, seasonal changes in moisture are less important. For the sparse midstory cases, this difference is about 10% for both overstory and mid/understory fuels, highlighting the fact that fire behavior is partially dominated by both wind and moisture effects.
- **Rate of consumption** The rate of consumption with respect to time closely follows the trends of actual consumption. However it is important to note that the rate curve is not uniform and is highly variable in time. This non uniformity is more conspicuous for the overstory fuel compared to the midstory and understory fuels. This is due to the complex nature of the turbulence and combustion phenomena across a strongly heterogeneous canopy fuel complex.

To understand the role of turbulence inside the canopy in more detail, virtual sensors were placed at different locations on the domain, so turbulent statistics could be calculated. In section, time series of such turbulence statistics are presented.

Characterization of wind and turbulence. Figure 5a shows 1 min moving average means of several quantities at 3 m height at the domain center. Figure 5b shows the same at 7 m and Fig. 5c shows the same for 15 m height. These three locations are chosen so the variations in turbulent quantities and fluxes can be shown with time as the fire approaches the domain and with height so the dynamics inside the canopy can be probed in a much more detailed and quantitative way. Several observations can be made from Fig. 5a–c:

- **Mean streamwise velocity** (U) Because of higher vegetative drag, the U velocities are higher for the cases with no midstory and sparse midstory compared to the dense midstory case before the fire reaches the center of the domain. The DD case also records negative U velocities at 3m height before the fire starts influencing the velocity field. The velocities for all cases are centered around 1–3 ms^{-1} before the influence of the fire, with the dense midstory cases (dry and moist) recording the lowest U velocities. Once the fire starts influencing the velocity field, the U velocities for the six different cases diverge widely. Still, the no midstory cases report the highest U velocities—about 6–8 ms^{-1}. However, when the fire reaches the domain center, the DN case records a strong U velocity even at 7 m height (7 ms^{-1}). This is likely due to also the loss of vegetation due to burning, which reduces the drag force when the fire passes a particular region. The DN case also records

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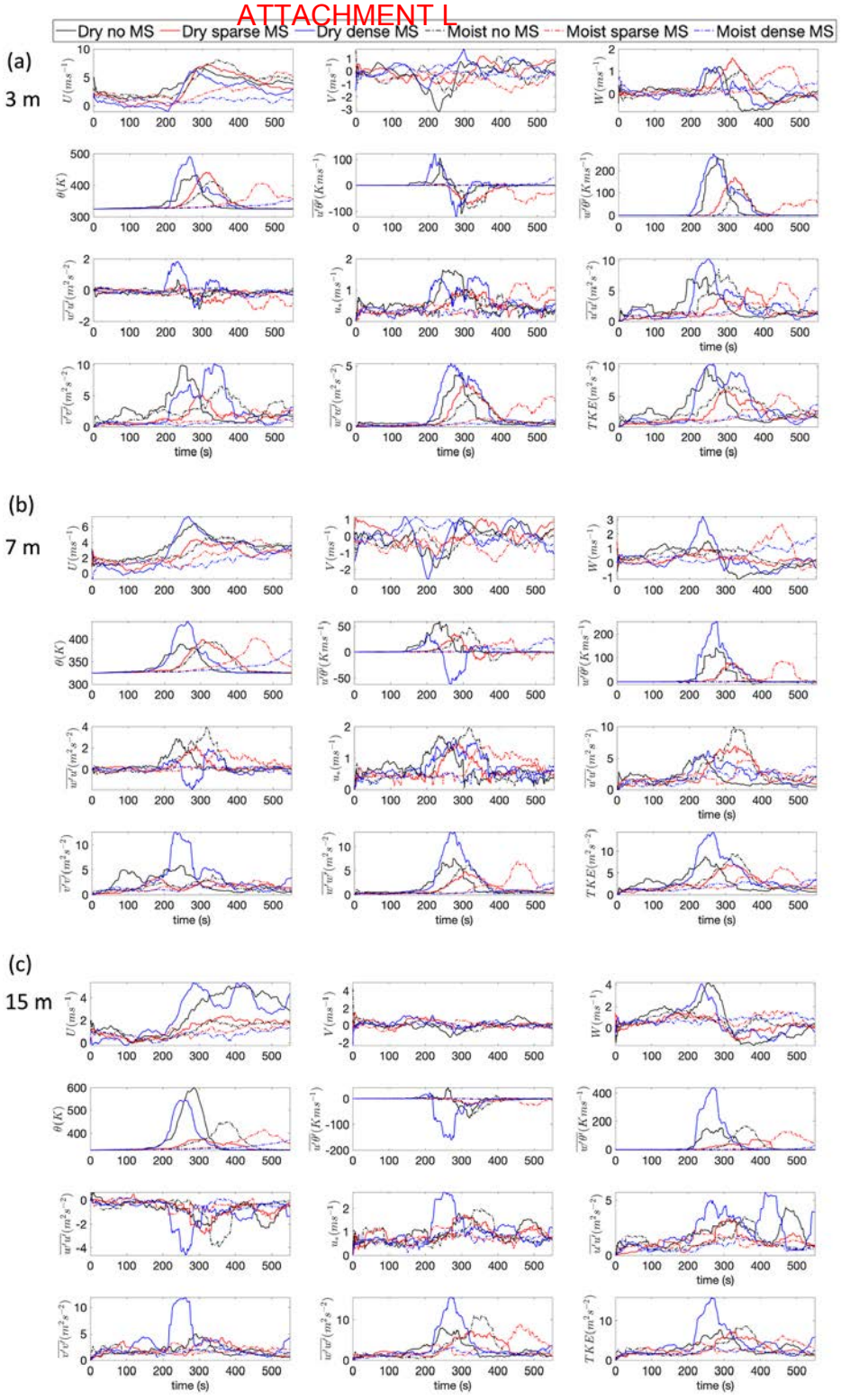

Figure 5. Moving average of turbulence statistics at (**a**) 3 m height, (**b**) 7 m height and (**c**) 15 m height at the domain center. Line styles are same as Fig. 3. U is the mean streamwise velocity, V is the mean cross stream velocity, W is the mean vertical velocity, θ is potential temperature, $\overline{u'\theta'}$ and $\overline{w'\theta'}$ are sensible heat flux along the streamwise (u) and vertical (w) directions (the primed quantities are fluctuations from the mean). $\overline{w'u'}$ is the vertical momentum flux, $\overline{u'u'}$, $\overline{v'v'}$ and $\overline{w'w'}$ are velocity variances in u, v and w directions respectively. TKE is turbulent kinetic energy and defined by one half of the summation of $\overline{u'u'}$, $\overline{v'v'}$ and $\overline{w'w'}$.

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strong U velocities at 7 m height, both before and during the fire front passage. At 15 m, the high canopy drag results in lower velocities for all the cases except for the DD case and the DN case. The high velocity for the DD case is partly due to loss of fuel by burning and partly due to high turbulence due to buoyancy. Note that U is generally higher for all cases the the canopy mid-story and understory compared to the canopy crown region where the drag is much higher.

- **Mean cross stream velocity** (V) Although the inflow boundary conditions prescribe a zero V component, it becomes finite as the flow field is influenced by the fire. Before the fire influences the domain, the V velocities are centered around zero. However they start to diverge as the fire gains strength. As noticed in Fig. 2, there is a significant cross flow component as the cold wind wraps around the fire and entrains the burnt area behind the top flank of the fire. This V component also experiences drag and thus the no midstory case has the highest ($-3\ \mathrm{ms}^{-1}$) V velocity at 3 m height. Interestingly, the DD case also picks up a strong V component, probably influenced by cold air entrainment due to high intensity burning. At 7 m height, the finite V component still persists. However, at 15 m, the V velocity component is almost zero, due to the strong drag effects of the vegetation crown.
- **Mean vertical velocity** (W) At 3 m height, the cases with no and sparse midstory has strong vertical updrafts ($1.5–2\ \mathrm{ms}^{-1}$). This can be attributed to lower drag forces, as dry and moist scenarios for these two cases record similar W components as well. Interestingly, the DD has strong updrafts but the MN case does not. This indicates that the buoyancy generated due to intense burning of dry fuels is responsible for the updrafts. Note that the strong updrafts are followed by downdrafts (order of $0.5\ \mathrm{ms}^{-1}$), as the cold air entrains the burnt area behind the fire front. At 7 m, the DD case reports even higher updrafts ($3\ \mathrm{ms}^{-1}$) and a stronger downdraft ($-1\ \mathrm{ms}^{-1}$) after the fire front moves past the virtual sensor. This is likely due to the presence of dense dry midstory which burns vigorously, and supported by the fact that under moist conditions, the dense midstory case has lowest W components. This effect is dominated by stronger drag forces. Interestingly, the sparse moist midstory case also has strong updrafts ($2.5\ \mathrm{ms}^{-1}$), likely due the nonlinear combination of drag and buoyancy effects. At the crown level (15 m height), both the dry dense and DN cases record strong updrafts ($4\ \mathrm{ms}^{-1}$), due to effects described previously.
- **Potential temperature** (θ) at 3 m height, the air temperature reaches the highest level (500 K) for the DD case. The no midstory and sparse midstory cases reach slightly lower temperature (about 375 K). The dry cases reach higher temperatures than the moist cases, as expected. The only exception is the MS case (about 300 K). This also explains the previous observations regarding the high updrafts for the dry midstory cases. At 7 m height, the difference among the cases become more prominent. The DD case reaches a peak temperature of about 450 K and the other cases reaches around 400 K when the fire reaches the sensor. At the crown level of 15 m, the dry dense and DN cases reach high temperatures of about 550–600 K. The other cases still record about 400 K.
- **Streamwise sensible heat flux** ($\overline{u'\theta'}$) This term can also be called the kinematic advective heat flux along the streamwise (x) direction and is a measure of horizontal heat transfer along the mean flow direction at any level. A positive heat flux should indicate advective heating of the fuel elements in the direction of the fire spread. This is why the peaks for $\overline{u'\theta'}$ occur before the spike in temperature as the fire approaches the sensor. The DD case records the highest $\overline{u'\theta'}$ at 3 m height (about $110\ \mathrm{K\ ms}^{-1}$), followed by the DN case. After the fire passes, the $\overline{u'\theta'}$ becomes negative, indicating that the fuel elements are cooling down. At 7 m height, the DN case records more advective heating compared to the DD case. However, the magnitude of $\overline{u'\theta'}$ is lower at 7 m, about $50\ \mathrm{K\ ms}^{-1}$ for the DN case. This can be attributed to higher amount of fuel availability at this level. Interestingly, the moist cases record $\overline{u'\theta'}$ of a similar order of magnitude. This indicates that advective heating at the midstory level in the model is dominated by wind and drag, not moisture. At the crown height of 15 m, the heating effects are even smaller than the midstory and understory levels. However, there is strong cooling effect, probably attributed to the crowning behavior at this level.
- **Vertical sensible heat flux** ($\overline{w'\theta'}$) A positive value of $\overline{w'\theta'}$ represents an upward flux of warm air due to buoyancy and should be interpreted as a measure of the strength of the buoyant flame dynamics. The presence of a fire generates buoyancy driven turbulence, which should result in a strongly positive $\overline{w'\theta'}$. The dry cases register higher values of vertical sensible heat flux compared to the moist cases. At 3 m, both the DD and DN cases record similar $\overline{w'\theta'}$, about $250\ \mathrm{K\ ms}^{-1}$. The DS case records about $175\ \mathrm{K\ ms}^{-1}$. At 7 m, the trends remain similar, although the DD case $\overline{w'\theta'}$ values (about $250\ \mathrm{K\ ms}^{-1}$) are nearly twice as large as the the DN case. This behavior is an indicator of laddering as the fire climbs up towards the crown. The MN case has lower $\overline{w'\theta'}$ at 7 m height (about $70\ \mathrm{K\ ms}^{-1}$) which indicates that the sensible heat flux is definitely impacted strongly by fuel moisture. However, the dry sparse and moist sparse cases record similar $\overline{w'\theta'}$ at 7 m, which means that under sparse conditions, moisture effects are less prominent. At the crown height of 15 m, the DD case records a much stronger $\overline{w'\theta'}$ of about $400\ \mathrm{K\ ms}^{-1}$. while the other cases remain similar to the 7 m level. This increasing $\overline{w'\theta'}$ with height for the DD case is an indicator of crown fire behavior.
- **Vertical momentum flux** ($\overline{w'u'}$): The parameter $\overline{w'u'}$ represents the vertical flux of horizontal momentum and its value should be negative inside the vegetation canopy in regular atmospheric boundary layer flow as the canopy absorbs momentum from the flow and acts as a momentum sink. The value of $\overline{w'u'}$ should also change as the canopy is consumed by the fire, which changes canopy drag. However, as the presence of fire create a strong buoyancy driven updraft, it can create a positive momentum flux in the canopy sublayer. At the 3 m height, all the cases record negative $\overline{w'u'}$. However, as the fire passes the virtual sensor, the DD case records a strong positive $\overline{w'u'}$. However, as the fire passes the sensor, cool air rushes in a negative $\overline{w'u'}$ is recorded because of strong drag effects. The DN case also shows a similar behavior although the peak values are much lower. At 7 m height, the no midstory and sparse midstory cases, (both dry and moist) records strong positive $\overline{w'u'}$. Higher drag at this level reduces $\overline{w'u'}$ for the DD case. Interestingly, at 7 m level, the burning of midstory fuels still generate upward fluxes of momentum. At the 15 m level, the upward flux of

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momentum is small, indicating that the crown region absorbs the locally generated upward momentum flux and the fire does not 'leak' additional momentum into the atmospheric surface layer above the canopy. Moreover, at the crown height of 15 m, the canopy also absorbs momentum from the overlying air mass perturbed by the fire and the DD case absorbs most of it even when the fire is burning strongly. Another interesting fact is that the momentum flux is not very sensitive to moisture effects.

- **Friction velocity** (u_*) The friction velocity is computed as

$$u_* = (\overline{u'w'}^2 + \overline{v'w'}^2)^{1/4}, \tag{1}$$

where v' denotes cross stream velocity fluctuations and u_* represents the net magnitude of wind shear stress at a particular height. In regular atmospheric turbulence, u_* can range between 0.1 ms^{-1} to 0.5 ms^{-1}. At the 3 m height, u_* is indeed at that range for all cases, until the fire enhances the magnitude of the turbulence locally. This increase of u_* is observed for all cases during fire front propagation, which is associated with strong vertical motions close to the flame associated with a 'chimney effect'[69], resulting in higher turbulent stress. At 3 m height, the DN case records u_* around 1.6 ms^{-1} as the fire passes the sensor. The DD case records a slightly lower u_* but of similar order of magnitude during fire passage. The sparse cases also report a u_* about 1.2 ms^{-1}. At 7 m level, u_* is higher for all the cases, while the no midstory cases reach magnitudes around 2 ms^{-1}. The amount of moisture does not have much impact in the magnitude of shear stress and potentially is more strongly driven by the amount of fuel present and at the rate fuel is removed by fire. u_* returns to pre-fire magnitudes after the fire passes, in spite of ongoing smoldering. Interestingly, at crown height, the DD case has the highest magnitude of u_* (around 2.6 ms^{-1}), likely due to buoyancy generated turbulence during the fire. Before and after the fire passage, the dense midstory case has much lower magnitudes of u_*.
- **Turbulent kinetic energy (TKE):** The turbulent kinetic energy is computed as

$$TKE = \frac{1}{2}\left(\overline{u'u'}^2 + \overline{v'v'}^2 + \overline{w'w'}^2\right), \tag{2}$$

where u', v' and w' are fluctuations from the 1 min moving averaged mean. Figure 5 shows the individual components of TKE as well as the net TKE for the three heights and for the six different cases. At 3 m height, before the fire, the DN case has higher magnitudes of TKE, about 2.5 m^2s^{-2}, while the DD case has slightly lower TKE close to the surface. This indicates the effect of fuel drag. As the fire passes, the TKE for all cases increases significantly, from 0.5-2.5 m^2s^{-2} to about 10 m^2s^{-2}. The DD case records the highest TKE in this range. Interestingly, this TKE rise has two components. First, the large rise is contributed by $\overline{u'u'}$, during intense burning between 200 and 300 s. Next, a strong rise is recorded for $\overline{v'v'}$, between 300 and 400 s, which leads to the net TKE peak that lasts between 200 and 400 s. This rise is associated with strong crosswind flows that wrap around the fire. The $\overline{w'w'}$ component shows the contribution from buoyancy driven turbulence, which is vertical in direction. The DD case records the highest $\overline{w'w'}$ as well due to most intense burning, followed by the DN and DS cases. The moist cases record lower $\overline{w'w'}$ which is expected, as the intensity of burning is less. However, the patterns of $\overline{u'u'}$ and $\overline{v'v'}$ are more complicated as they are dependent of vegetative drag and how fuel is removed with burning, which also dictates the nature of the wind as it rushes to the upstream of the fire flank as the fire passes the area. The net TKE contains all these combined effects. After fire front passage, TKE values return to their pre-fire-front-passage values. Another interesting observation is that even during fire front passage, the relative contributions of $\overline{u'u'}$, $\overline{v'v'}$ and $\overline{w'w'}$ remain similar, i.e $\overline{w'w'} \approx 0.5\overline{u'u'}$ and $TKE \approx \overline{u'u'} \approx \overline{v'v'}$ in terms of magnitude, which is also observed in regular atmospheric turbulence[73]. At 7 m height, the net TKE follows similar patterns, although the DD case records about 15 m^2s^{-2} during fire passage, while the DN case is still at 10 m^2s^{-2}. This contribution is mainly due to buoyancy effects and cross stream velocity components, as the $\overline{w'w'}$ increases significantly at this height, about 15 m^2s^{-2}, due to higher fuel availability. At this height, the contribution to TKE from $\overline{u'u'}$ is rather small, because of higher fuel drag. The no midstory and sparse midstory cases have higher $\overline{u'u'}$ at this height. At the crown height of 15 m, the trends are similar to the midstory level. Another point to note here that the level of vertical turbulence can also set the boundary conditions for spotting potential, which can launch firebrands aloft. These embers and other burning particles can get transported by the turbulent wind aloft the canopy sub layer and create spot fires ahead of the fire front.
- **Isotropy** Another factor associated with TKE is isotropy. Figure 6 shows the time variation of $\overline{w'w'}/(2 * TKE)$ for all 6 cases, for the three heights 3 m, 7 m and 15 m. For isotropic turbulence, this value should be 0.33[71,74]. If this value is < 0.33, it indicates that the horizontal component of the TKE ($\overline{u'u'} + \overline{v'v'}$) strongly dominates over the vertical component $\overline{w'w'}$. Before the fire front passage, all cases exhibit strong anisotropy, however, the anisotropy is stronger (further away from 0.33) close to the ground surface and is more isotropic at crown height. During fire front passage, the strong buoyancy effects enhance $\overline{w'w'}$ and increases isotropy for all cases and all levels, especially for the DD case.

There are few instances in the literature that have reported fine-scale turbulent quantities in such detail as discussed above, especially in the context of wildfires spreading in a vegetative environment. However, Clements et al.[69] had conducted field experiments (FIREFLUX) which collected high frequency turbulent data on a micro-meteorological tower at four heights (2 m, 10 m, 28 m, 42 m) in the path of a grass fire. This allowed the authors to examine mean and turbulent quantities before, during and after fire front propagation. Clements et al.[69] used 1 min moving averages to look at the evolution of flow statistics as the fire passed the tower, which is the strategy used in this work as well. They observed friction velocities (u_*) in the range of 2.5–3 ms^{-1} at 2 m height and 3–3.5 ms^{-1} during fire front passage. The u_* observed in this study has a similar order of magnitude.

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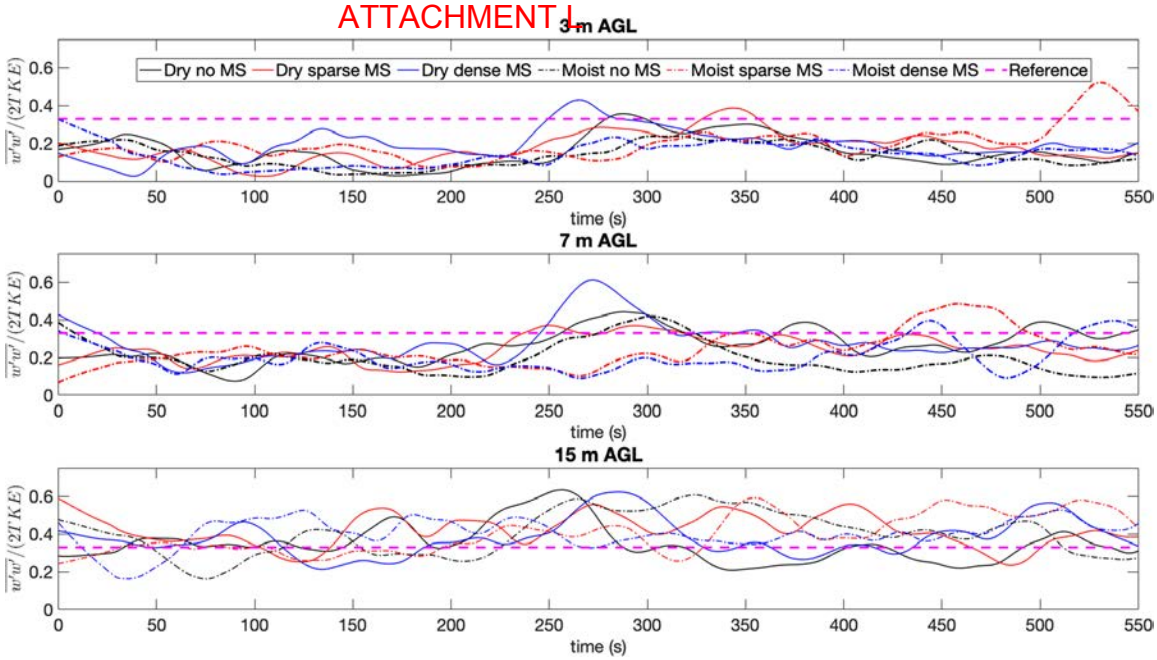

Figure 6. Time variation of 1 min averaged values of $\overline{w'w'}/(2 * TKE)$ showing turbulent anisotropy. Line styles are same as Fig. 3. Dashed magenta line shows the value of 0.33 for isotropic turbulence.

Moreover, they observed TKE in the range of 6–12 m^2s^{-2} which is also the range observed in this study. Heilman et al.[74] reported peak TKE values of 5–20 m^2s^{-2} during two burns at the New Jersey Pine Barrens (forest environment). Heilman et al.[71] reported similar trends of turbulence anisotropy (0.10–0.20) during these burn operations. The buoyancy flux, defined as $B_f = g/\theta * \overline{w'\theta'}$ are also on the order of 0.5–1 m^2s^{-3} similar to the magnitudes reported by[69]. However, the difference between fuel characteristics (grass in the case of[69], forest vegetation in this case) precludes further one to one comparisons.

Discussion

In this work, we investigated the drivers of wildfire spread following linear ignition in the context of active fuel reduction treatments. We further examined how clearing midstory vegetation alters fire behavior through changes in canopy drag and the interdependence on fuel moisture. A line ignition was used to investigate the fundamental processes in fire behavior, with the application of these simulations addressing potential fire size on initial attack success. Simulations in this study were conducted using HIGRAD/FIRETEC to observe bulk fire behavior indicators such as fire intensity, fire spread rate and fuel consumption.

The generally expected trend was found with the DD case, which produced the highest fire intensity. Interestingly, under dry conditions, the gradual lowering of midstory density did not yield monotonically decreasing trends of fire intensity. Up to a level of midstory thinning, termed sparse midstory in this study, the fire intensity and rate of spread were reduced. However, under the DN case, where most of the midstory and understory vegetation was thinned, the wind speed and turbulence levels were enhanced such that the rate of spread increased and was often higher than the DD case. More interestingly, the fire intensity actually increased compared to the DS case with the absence of midstory but lower than the DD case. The enhanced wind speed, turbulence and the resulting augmented sensible heat flux were partly responsible for this behavior, which is seemingly counter intuitive as the DS case was characterized by more fuels.

This behavior further highlight the trade off between fuel availability and wind effects. Under the DN case, the wind effects dominated as the canopy drag was low. Under the DD case, the fuel effect dominated as there is simply too much dry fuel. In the sparse case where both the fuel effects and wind effects were moderated, both fire spread and fire intensity were reduced. This trade off offers another perspective on the practice of fuel treatments with prescribed fires. Under dry conditions, both no thinning and excessive thinning can lead to high amount of fuel consumption. Whereas a moderate degree of thinning can lead to lowered consumption for both overstory and understory vegetation. Hence burn managers might consider this trade-off on consumption as well as the consequences on fire intensity and rate of spread when conducting cost-benefit analyses of a prescribed fire.

Under seasonably moist conditions, these trade-offs were absent and wind effects dominated the fire, with the fire being slower and less intense with higher fuel moisture. Higher winds drove the fire faster under moist conditions. To understand the physical mechanisms behind this behavior, detailed analyses were conducted by collecting data on virtual towers at different locations. Time series of flow quantities such as mean velocities, potential temperature and turbulent statistics such as sensible advective and buoyant turbulent heat fluxes, turbulent stress (momentum flux), friction velocity (a measure of shear stress) and turbulent kinetic energy and its components were plotted at the domain center, at three different heights, close to the surface, at midstory height and at crown height.

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These emergent picture of the consequences of nonlinear fire atmosphere interaction in the fine scales on fire behavior is also consistent with new insights coming out the analyses of a large number of recent fires in California[53], which were identified to be either fuel dominated or wind dominated. Consequences of long term fire suppression policy, silvicultural practices, grazing and timber harvesting practices can alter the fire regime in either directions. For the fuel driven fires, altering fuels can offer bottom up controls as hypothesized by Keeley and Syphard[53] and clearly demonstrated in this work. It is also important to recognize that when extreme synoptic scale wind events (such as Santa Ana winds) dominate fire behavior, fuel treatments are hardly a limiting factor and those cases are beyond the scope of the current manuscript. However, mastication and thinning operations can establish a higher degree of control even on fires on shrub type ecosystems under lower wind events[75,76]. Future research will attempt to establish the limits of these top down and bottom up controls on wildland and prescribed fires, as well as their interaction with complex terrain.

Nevertheless, a physical understanding of canopy-fire atmosphere in such detail as explored in this work can help burn managers design treatments to alter fire behavior. Moreover, the patterns of fire spread within treatment zones during initial attack will depend heavily on interacting factors of canopy-induced winds, fuels moisture, and loading. The suite of conditions under which desired fire behavior can increase suppression success can only be fully understood in the context of complex feedbacks. The details provided in the current analyses offers an unprecedented level of insight into mechanisms that govern momentum and energy exchange in the the complex heterogeneous canopy environment, which are relevant for fire behavior assessments. Moreover, the analyses also shed light on the potential indicators of high intensity crowning behavior. To conclude, this work highlights the importance of accounting for the effects of vegetation management, fine-scale vegetation heterogeneity, winds, and turbulence on fire behavior when conducting prescribed burn operations and the success of initial attacks on wildland fires.

Methods

Fuel data. The fuel data were collected at the Eglin Air Force Base in Florida. Based on tree inventory data, three major species of trees were present, namely longleaf pines (*Pinus palustris*), common persimmon (*Diospyros virginiana L.*) and turkey oaks (*Quercus cerris*). Further details about the fuel data collection methods are described in[77]. The average tree canopy density (fine fuel) was 0.3 kg m^{-3} for longleaf pines and persimmons. For turkey oaks, this value was 0.4 kg m^{-3}. The density of grass was 1.573 kg m^{-3}, with an average grass height of 0.5 m. The average litter height was 0.1 m and the litter load was 5.0 kg m^{-3}. Moreover, the density of grass was reduced and the litter density was increased below the trees due to canopy shading, using an exponential attenuation factor 5.0. Under the moist condition, the nominal fuel moisture was 133% for longleaf pines, 170% for persimmons, 200% for turkey oaks and 8% for grass and litter. The nominal fuel size was 0.0005 m for longleaf pines and persimmons and 0.0002 m for turkey oaks. Note that the persimmons and the turkey oaks usually comprised the midstory. In the dry season, the moisture for the turkey oaks were 15% and the persimmons were killed (omitted from the fuel complex in the model). Tree data were collected in three stages of management—'no midstory' where there are only 408 pines per hectares (1 hectare is equal to 10,000 square meters) , 'well managed or sparse midstory' where there are 408 pines, 551 persimmons and 44 turkey oaks per hectare; 'unmanaged or dense midstory' where there are 408 pines, 551 persimmons and 983 turkey oaks per hectare. The average height for the longleaf pines was 18 m and the average height for the midstory vegetation was about 11 m. It is also important to note that the fuel loading values (2.0–2.5 metric tons per hectare for midstory + understory) and 2.7–3.0 metric tons per hectare for overstory) are consistent with those observed both in the US Southeast (Longleaf and Loblolly pines)[78] and the Southwest (Ponderosa pine and mixed conifer stands)[79]. So the observations in this work are deemed to reflect a wide range of conditions. Another important point to note is that the moist or dry conditions in fuel moisture are entirely driven by seasonality and not by other management efforts.

Since the purpose of these simulations was to isolate the effects of midstory fuel management on wildland fire behavior, surface fuel conditions were held unchanged. Varying the surface fuel moisture would impose additional variations in fire behavior unrelated to treatment evaluations—and it would further complicate the interpretation of the results. In addition, whether this level of midstory fuel treatment would be sufficient to make the surface fuel drier is not clear and the literature poses contrasting evidences. Whitehead et al.[15] noted that forest thinning might lead to enhanced solar radiation, wind speed and near-surface temperature but did not find any significant changes in relative humidity or surface fuel moisture. Kalias and Kent[17] lists several studies which reported fuel treatment effects on fuel moisture and fire behavior. Banerjee[18] also offers a detailed review on this topic and summarizes these contrasting evidences. Some field experimental studies such as Bigelow and North[80], Faiella and Bailey[81] and Estes et al.[82] have reported no appreciable changes in the surface fuel moisture post thinning. Bigelow and North[80] argued that micrometeorological changes in the sub canopy environment post thinning can counter each other. An increase in wind speed after thinning could increase the turbulence driven mixing of the air above and below the canopy sub layer, thereby not allowing air temperature to increase or surface fuel moisture to decrease. On the other hand, some other studies such as Pook and Gill[83], Weatherspoon et al.[84] and Countryman[85] noted that thinning could lead to a drier surface fuel layer, which could enhance fire intensity. Given these uncertainties, it is unclear at this stage if changes in the midstory fuel (without removing the entire crown) would lead to any appreciable changes in the surface fuel moisture. While more research is needed to address this topic, the surface fuel properties were held fixed in this study while the midstory fuel was varied across the six simulation cases in this study based on available data.

Model description. Simulations are conducted using the HIGRAD/FIRETEC code developed at Los Alamos National Laboratory[86–88]. FIRETEC is a large-eddy simulation (LES) tool that can resolve atmospheric tur-

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bulence over three dimensional heterogeneous fuel distributions at spatial resolutions on the order of 2 m and can capture the spread, intensity and extent of burn area under different ignition conditions. FIRETEC simulates the movement of a wildfire by accounting for a few processes, such as the convective heating of fuel elements in front of a flame, the entrainment of cold air from the surroundings atmosphere, radiative heating and cooling of fuels and the drag experienced by the wind over vegetation canopy. The combustion of solids, which leads to chemical products and heat, is handled using a single compartment model without regards to chemical composition of the fuels. More specifically, it includes an evolution equation for the density of dry fuel as well as the density of water separately. A budget equation for the internal energy of the fuel that includes radiation, advection and energy exchange due to chemical reactions and evaporation of water tracks the temperature of the solid fuel elements. The evolution of the density and momentum of the gas phase are governed by the mass and momentum budgets of a fully compressible Navier Stokes equation. There is another budget equation for the internal energy of the gas phase which results in the potential temperature of the gas phase. It includes turbulent advection, turbulent diffusion as well as radiation effects and the energy exchange with the burning solids. Last but not the least, an advection diffusion equation tracks the evolution of oxygen. It is important to note that fine scale (below 2 m) processes are treated as sub grid scale processes. The sub grid scale variations of temperature, velocity and fine scale fuel features are parameterized.

Simulations. Each simulation is conducted over a 400 m by 320 m (12.8 ha) domain with a grid resolution of 2 m by 2 m. The vertical extent of the domain is 550 m. The vertical grid resolution is non uniform and uses a grid stretching function in order to accommodate more grid points close to the surface within the vegetation canopy. There are 49 grid points in the vertical direction, 12 of which are within the canopy layer. The average grid spacing within the canopy layer is 1.8 m. The time step of each simulation is 0.02 s. Each simulation is spun up with a wind run for 3100 s (about 52 min) so that sufficient turbulence is generated and the wind field develops a steady state. Periodic boundary conditions are used on both sides of the domain. 80 processors are used in parallel for each set of simulations. An inlet wind profile with a value of 8 ms^{-1} at 30 m above ground level (AGL) is prescribed, which adjusts to the vegetation for the corresponding simulation during the wind run and follows a logarithmic profile above the zero plane displacement height. A free slip boundary condition is used at the top of the domain. The fire simulations start after the wind runs, with an ignition line, 4 m wide, 80 m long and offset by 80 m from the left edge of the domain along the wind direction (x axis) and centered perpendicular to the wind direction (y axis). Note that line ignitions are standard while investigating fundamental aspects of wildland fire behavior both in terms of experiments and simulations[46,87]. The target temperature of ignition is 1000 K and a ramp rate of 350 K s^{-1} is used. Each fire simulation is run for 600 s (10 min).

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Author contributions

T.B. planned and designed the project, conducted the analysis and wrote the paper. R.L. and K.H. collected the fuel data used in the paper. K.H., S.G and W.H provided comments and suggestions.

Competing interests

The authors declare no competing interests. The founding sponsors had no role in the design of the study; in the collection, analyses, or interpretation of data; in the writing of the manuscript, and in the decision to publish the results.

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Additional information

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Deconstructing the King megafire

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Abstract. Hypotheses that megafires, very large, high-impact fires, are caused by either climate effects such as drought or fuel accumulation due to fire exclusion with accompanying changes to forest structure have long been alleged and guided policy, but their physical basis remains untested. Here, unique airborne observations and microscale simulations using a coupled weather–wildland-fire-behavior model allowed a recent megafire, the King Fire, to be deconstructed and the relative impacts of forest structure, fuel load, weather, and drought on fire size, behavior, and duration to be separated. Simulations reproduced observed details including the arrival at an inclined canyon, a 25-km run, and later slower growth and features. Analysis revealed that fire-induced winds that equaled or exceeded ambient winds and fine-scale airflow undetected by surface weather networks were primarily responsible for the fire's rapid growth and size. Sensitivity tests varied fuel moisture and amount across wide ranges and showed that both drought and fuel accumulation effects were secondary, limited to sloped terrain where they compounded each other, and, in this case, unable to significantly impact the final extent. Compared to standard data, fuel models derived solely from remote sensing of vegetation type and forest structure improved simulated fire progression, notably in disturbed areas, and the distribution of burn severity. These results point to self-reinforcing internal dynamics rather than external forces as a means of generating this and possibly other outlier fire events. Hence, extreme fires need not arise from extreme fire environment conditions. Kinematic models used in operations do not capture fire-induced winds and dynamic feedbacks so can underestimate megafire events. The outcomes provided a nuanced view of weather, forest structure, fuel accumulation, and drought impacts on landscape-scale fire behavior—roles that can be misconstrued using correlational analyses between area burned and macroscale climate data or other exogenous factors. A practical outcome is that fuel treatments should be focused on sloped terrain, where factors multiply, for highest impact.

Key words: coupled atmosphere–fire model; fire behavior; fire model; LiDAR; multiple plumes; numerical weather prediction; pyrocumulus; wildfire; wildland fire.

Introduction

Wildfire is a major force in the western United States and globally and has the potential to reshape forested landscapes into new and possibly novel configurations (Bond and Keeley 2005, Turner 2010). For years, concern has been rising that long-term fire exclusion (Keane et al. 2002) and, increasingly, climate change may be changing fire behavior and increasing the risk of very large, severe fires (Westerling et al. 2006, Williams 2013), yielding a new category of wildfires, "megafires," that are becoming more common in the western United States and perhaps worldwide. The term became widespread in 2002 when five western U.S. states experienced their worst fires on record (Williams 2013), the magnitude and impacts of which stood out even in regions frequented by fire. The term has since been applied to describe outbreaks of large, intense fires in other fire-prone locations such as Australia (Bartlett et al. 2007), Canada (Stocks et al. 2003), Greece (Dimitrakopoulos et al. 2011), and Europe overall (Tedim et al. 2014). Criteria identifying a megafire vary; fires may be notable in terms of size, severity, cost, resources required, or human, economic, or environmental impacts.

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Analysis of historical data suggests that climatic factors have become more favorable for wildfires in general (Westerling et al. 2006, Barbero et al. 2014, Dennison et al. 2014, Stavros et al. 2014), and very large fires in particular (Dennison et al. 2014), increasing their frequency and extent (Dennison et al. 2014) over recent decades in some regions. Though still an infrequent event—only a small percentage of fires exceed 100 ha in size—very large fires have a disproportionate impact on overall area burned (Littell et al. 2009), 80–96% of which is due to the largest 1% of fires (Strauss et al. 1989). The hypotheses that megafires in general, or individual megafires in particular, are directly attributable to either climate change effects such as drought or long-term fuel accumulation due to fire exclusion with accompanying changes to forest structure have been widely asserted but are not directly experimentally testable; most evidence supporting either thesis is correlational, integrated over broad scales, and circumstantial. The climate hypothesis (Dale et al. 2001, Flannigan et al. 2009) has generated debate amid the broader climate change controversy while the "century of suppression" hypothesis (Williams 2013) has led to second-guessing of well-intentioned and strongly supported fire management programs and intense criticism of land management agencies. The debate has raged with significant consequences on forest policy issues, conservation, healthy forest initiatives, and public passion. The debate in the United States is paralleled by debates elsewhere in countries with fire-prone ecosystems.

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Similarly, debates have contested the relative importance of climate-scale factors such as drought vs. day-to-day weather in creating very large fires (Abatzoglou and Kolden 2011, Riley et al. 2013). Fire growth is episodic, and even during sustained drought, most growth occurs on a small proportion of days—not always consecutive—during a wildfire's active period (Wang et al. 2014). Anecdotal firefighter reports from recent megafires describe unprecedented fire behavior that could not be reproduced with standard fire behavior modeling systems. Further complicating understanding, observational data on megafires, which may behave differently than less extreme events (Alvarado et al. 1998, Pyne 2015), have been limited. Reproducibility that is possible with repeatable laboratory experiments and more common occurrences is often not possible when the subject is an extreme or unusual unplanned natural event. Thus, broad regional statistical analyses have been recommended (Schoennagel et al. 2004), either time series or spatial correlations, to draw out the causal factors. Inferences about the atmospheric factors causing these events, for example, have relied upon statistical correlations between megafire occurrence and macroscale monthly weather data (Bowman et al. 2017) and been specified to speculate on the cause of individual megafires or megafires in general. Brotak and Reifsnyder (1977) identify synoptic conditions associated with large fires, chiefly strong prefrontal surface winds preceding a trough, while Peterson et al. (2015a) draw similar conclusions in the context of the Rim Fire, concluding strong prefrontal surface winds aligned with terrain drove some periods of extreme fire spread. Similarly, studies have used statistical analyses to identify environmental factors related to observed degrees of severity, such as the severity of previous burns and topographic slope (Harris and Taylor 2017) and, for the Rim Fire, the influence of forest structure, fire history, topographic, and weather conditions (Lyderson et al. 2014). The latter study indicated that on days characterized by strong plume activity, severity was moderate to severe regardless of forest conditions. While these approaches identify general associations, they may overlook important factors for which data are not available. Thus, the mechanisms causing the emergence of one of these rare events are still not well understood and have not yet been scrutinized with complementary methods such as physically based process studies, either observational studies or contemporary dynamic models that simulate fire behavior—methods that, of necessity, examine individual events.

This study decomposes the factors leading to the size, behavior, and duration of a megafire of a type increasingly common in the United States and similar to fires in Mediterranean Europe, Australia, Canada, and Israel. The 2014 King Fire, which occurred in California's northern Sierra Nevada mountains, stood out due to its size, rapid spread, and severity. It provides a unique opportunity for hypothesis testing and separation of the effects of climate, short-term weather, and forest condition because airborne remote sensing provided preburn forest structure and vegetation type data, thermal imagery during the fire, and quantitative characterization of impacts to vegetation postfire. Before the King Fire, in the summer of 2014, NASA's preHyspIRI preparatory program (Lee et al. 2015) imaged the entire region containing the fire with high-resolution airborne spectroscopic and thermal sensors. Additionally, much of the area was surveyed with LiDAR by the U.S. Department of Agriculture Forest Service, providing direct information on forest structure. Thermal imagery was acquired during active burning, and comprehensive LiDAR, thermal, and spectroscopic data were acquired over the burn scar shortly after the fire. These data sets, taken together, allow fire behavior during the event to be related to prior forest structure and field condition, enable energy release during the fire to be estimated from contemporaneous thermal imagery, and further constrain modeled fire behavior by comprehensively surveying residual forest structure postburn. By combining these data with a fully mechanistic coupled atmosphere–wildland-fire model, we could estimate the separate effects of the antecedent drought, fuel, forest structure, topography, and weather on a single fire. By doing so, we could connect cause and effect as in a process study and uncover the dependency of fire behavior on these contributing factors in a way that is currently unique and a countercheck to conclusions garnered from the previously mentioned broad statistical analyses. This more clearly refines how climate change impacts might be distributed locally and how climate change, disturbances, and land management practices might cumulatively shape future fires. While the King Fire is only a single example and inherently unreplicable and this data set is unique and likely to remain so until and unless spectroscopic and LiDAR coverage becomes ubiquitous, this study provides a paradigm for interpreting the factors that lead to extreme fires.

We seek to disentangle the influence of weather, fuels, and climate factors on the King Fire and provide insights into megafire behavior. We ask (1) Does current understanding, as encapsulated in a state-of-the-art modeling system, explain the megafire's behavior? (2) Does better representing the spatial variability of forest structure, derived solely from airborne remote sensing observations of pre- and postfire forest structure and composition, improve simulation and understanding of fire behavior and effects? We examine attributable factors to answer (3) What role did fire-induced winds play in its rapid growth? (4) Did drought contribute to the fire's rapid growth and extent? (5) How would this fire have behaved if fuel had not accumulated? This uniquely observed case study provided an opportunity to gain insight that can inform science and wildfire management more generally, as well as raising hypotheses that can be tested in other settings. Because, while these factors may have differing importance in other fires occurring in different terrain, forest type, and weather, the physical relationships presented in this study, as well as identification of the conditions under which drought and fuel load can and cannot affect fire behavior, are ubiquitous. This work suggests how megafire behavior may be better interpreted, predicted, and mitigated.

Study context

During the study period, a trough of low pressure was approaching the California coast, preceded by weak southwesterly surface winds, where they generally ascended the west slopes of the Sierra Nevada Mountain Range. The King Fire was ignited at 18:37 (all times Pacific Daylight Time [PDT], Coordinated Universal Time [UTC] −7 h) on 13 September 2014 near Pollock Pines, California, USA (ignition location

38.782° N, 120.604° W). It spread during a severe drought (Griffin and Anchukaitis 2014) in the central Sierra Nevada mountain range in complex terrain covered by mixed conifer forests (shown in Appendix S1: Fig. S1), which generates complex fuel beds shaped by drought, land management practices (e.g., forest cultivation and harvesting, fire suppression, and fuel mitigation), and burn scars from numerous prior fires. The King fire grew 7 km to the northeast through the evening of 16 September as nearby surface weather stations recorded weak-to-moderate south-southwesterly winds (Fig. 1a) upon which weak diurnal circulations (e.g., 0–3 m/s at Bald Mountain) and gusts of 2–10 m/s were superimposed (Fig. 1b). From 21:49 on 16 September, when the fire was mapped by the National Infrared Operations (NIROPs) airborne imager, until 13:06 on 17 September, when satellite active fire detection data from the Visible and Infrared Imaging Radiometer Suite (VIIRS; Schroeder et al. 2014) detected the fire entering the Rubicon Canyon, the fire traveled north over rolling hills. In an afternoon run that was unanticipated in light of weak-to-moderate ambient winds, the fire grew over 16,200 ha (40,000 acres), racing approximately 25 km to the northeast over the next 11 h, an average spread rate of 2.3 km/h, following the canyon to its crest at Hell Hole Reservoir, where growth stalled. Operational fire behavior models largely failed to capture this run, instead predicting slower expansion similar to previous days (J. A. Fites-Kaufman, *personal observations*). Beginning at 16:00 on 17 September, humidity increased and area winds weakened and changed to easterlies, redirecting and slowing growth (Fig. 1c). Progression was mapped nightly by NIROPs (Fig. 1d) and twice daily (early afternoon and midnight) by VIIRS. The fire was contained at 39,545 ha (97,717 acres) on 10 October.

Based on how the fire environment (fuel properties and moisture content, terrain slope, and weather, notably wind) affects fire behavior, primary factors that could have shaped this event are winds, which may have included fire-induced winds; the Rubicon Canyon's inclined, concave shape; and fuel properties including amount, vegetation type and structure, and fuel moisture content. Appendix S1 reviews key dependencies. In summary, (1) fire spread rate is only weakly

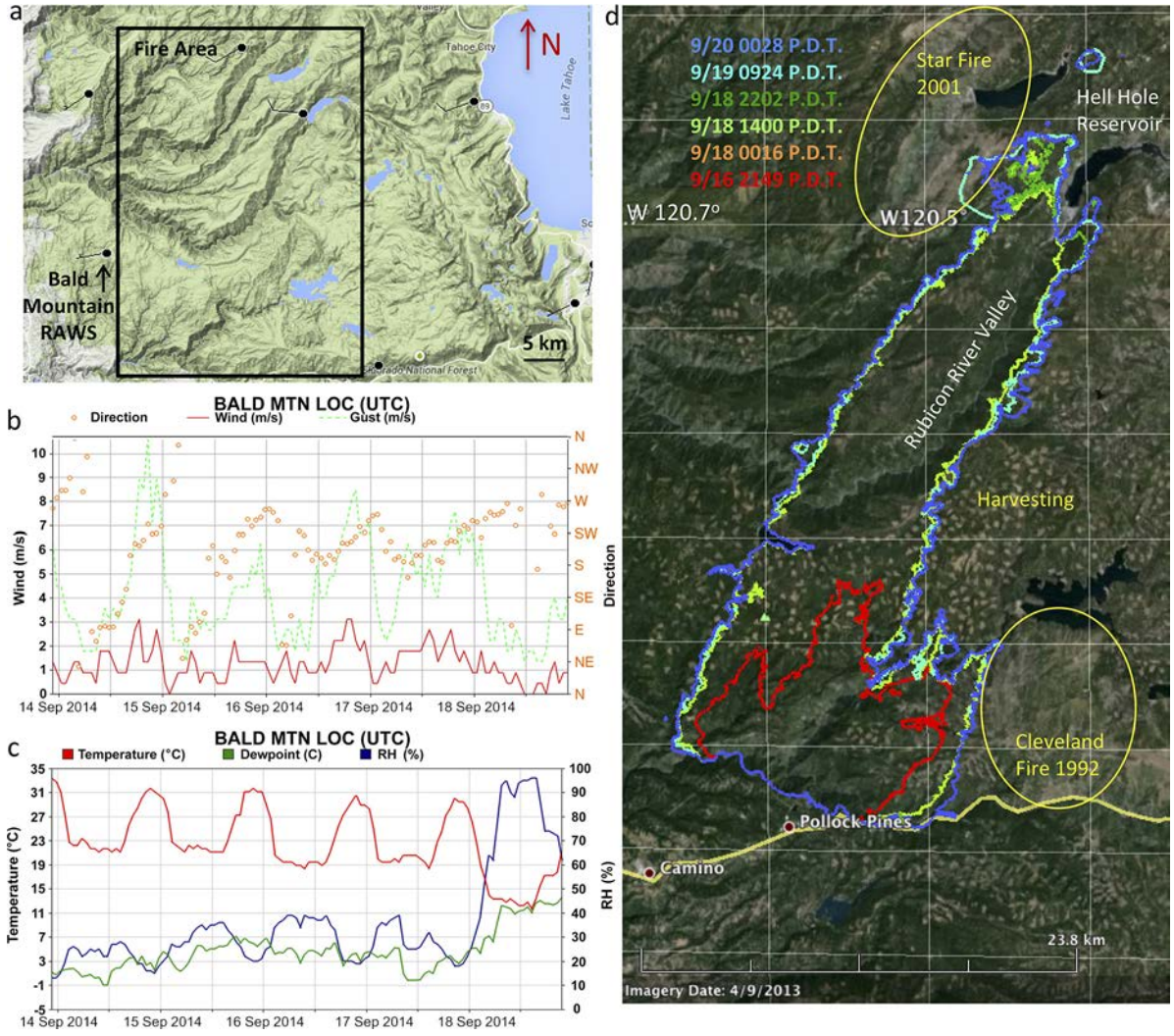

FIG. 1. Overview of the King Fire (California, USA) environment and progression. (a) Weather station wind data near the King Fire at 14:00 17 September. The boxed area is shown in (d). (b) Winds at Bald Mountain weather station. Wind directions are N, north; NW, northwest; W, west; SW, southwest; S, south; SE, southeast; E, east; NE, northeast. (c) Temperature and humidity at the Bald Mountain weather station. (d) NIROPs airborne fire mapping data collected during periods 1 and 2. Yellow annotations indicate disturbance areas.

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influenced by fuel load, (2) spread rate is directly influenced by the dead fuel moisture content, which responds rapidly to weather changes, rather than the fuel moisture content of live canopy fuels, which reflects longer term conditions such as drought, and (3) spread rate is indirectly sensitive to conditions that cause faster heat release on inclined terrain through production of an along-slope component of fire-induced winds.

Materials and Methods

Model description

The CAWFE modeling system (derived from coupled atmosphere–wildland-fire environment) integrates a numerical weather prediction (NWP) model (Clark and Hall 1991, Clark et al. 1996, 1997) designed for simulations in complex terrain with a wildland fire behavior module (Clark et al. 2004, Coen 2005, 2013). Fig. 2 shows a schematic of the system. Gridded atmospheric states from model analyses (distributed by the National Oceanic and Atmospheric Administration) are used to initialize and update the boundary conditions of the outermost of several interactive, nested modeling domains (analyses *available online*).[5] Regional weather is simulated at horizontal grid spacing of tens of kilometers while horizontal and vertical grid refinement allows simulations to telescope into tens to hundreds of meters near the fire.

CAWFE operates at resolutions that are extremely fine for weather models yet too coarse to resolve combustion. Instead, the fire module parameterizes fire processes with semiempirical relationships. A semiempirical spread rate formula (Rothermel 1972) is used to parameterize surface fire spread in terms of terrain, fuel properties, and wind at the fire line, although in CAWFE, the latter includes fire-induced winds. Another relationship (Albini 1994) estimates the rate at which fuels of various sizes are consumed once passed by the flaming front. The model calculates the sensible (thermal) and latent (water vapor) heat releases and the smoke particulate release via an emission factor. The surface fire heats and dries the tree canopy, if present. If the remaining heat flux exceeds a threshold (Van Wagner 1977), a crown fire is ignited and travels through the canopy at a semiempirically determined rate (Rothermel 1991), consumes the tree biomass, and releases more sensible and latent heat. A simple radiation treatment distributes sensible and latent heat fluxes and particulates from the fire into the lower atmosphere. The NWP model and fire module are coupled such that heat and water vapor fluxes from the fire alter the atmospheric state, notably producing fire winds, and the evolving atmospheric state affects fire behavior.

CAWFE's fire behavior module is similar to the standard fire behavior models used as operational tools. However, key differences are that CAWFE simulates three-dimensional airflow at fine resolution (hundreds of meters) as it varies in time and space over the fire, capturing intricate mountain airflows, whereas standard fire models project fire extent by ingesting weather data (either a single time or a time series) from a single weather station that may be kilometers from the fire or, more recently, a coarse surface weather-gridded forecast product. In addition, CAWFE is a dynamic modeling system that allows two-way feedback between the weather and the fire, allowing the heat released by the fire to alter the atmospheric state, which, in turn, directs the fire. These "fire-induced winds" (discussed in Appendix S1: Section "Winds") may greatly exceed background winds. CAWFE has been applied to wildland fires that span a wide range of terrain, weather, and fuel conditions (e.g., a windstorm in the Colorado Front Range [Coen and Schroeder 2015], solar heating-driven mountain valley circulations [Coen 2005], a southern California Santa Ana [Coen and Riggan 2014], and a thunderstorm gust front in the desert southwest [Coen and Schroeder 2017]). The weather model has been applied and validated over 30 yr to simulate many meteorological phenomena, including precipitation formation, terrain-induced turbulence, and windstorms. CAWFE simulations of over 15 fire events have been tested against in situ measurements and incident team maps, fires mapped by airborne infrared instruments, and VIIRS satellite active fire detection data (Coen and Schroeder 2013, 2015, 2017, Coen and Riggan 2014).

Experimental design

The objectives of the study were to reproduce the unfolding of the King megafire and then analyze sensitivity experiments to disentangle how factors contributed to its exceptional and unanticipated behavior. The factors include terrain-shaped airflows, fire-induced winds, drought as it affects fire behavior, fuel accumulation as it affects fuel loads, and forest structure as revealed in a separate study by analyses of airborne remote sensing measurements.

CAWFE was applied to two periods during the King Fire, separated because model error growth precludes a single fine-scale simulation from retaining sufficient skill throughout the entire event. First, a four-nested-domain simulation (finest atmospheric spatial resolution, 370 m; fuel grids, 74.1 m) modeled the period 17:00 16 September to 19:45 18 September, initializing a fire in progress using the 21:49 16 September NIROPs airborne fire mapping data.

In the second period, a five-nested domain simulation (finest atmospheric spatial resolution, 185 m; fuel grids, 37.0 m) spanned 21:00 18 September to 20:51 19 September, during which time the fire was initialized in progress with the 01:03 19 September VIIRS active fire detection data (Schroeder et al. 2014). National Centers for Environmental Prediction (NCEP) Final Operational Global Analysis-gridded atmospheric data were used to initialize the atmospheric state and provide boundary conditions to a Weather Research and Forecasting (WRF) Model (Skamarock et al. 2005) simulation. WRF dynamically downscaled the analyses to provide initial conditions and hourly lateral boundary gradients of atmospheric state variables for the outermost domain (10-km horizontal grid resolution) of CAWFE simulations. Inner CAWFE domains were refined to 3.33, 1.11, 0.370, and (for period 2) 0.185 km. Simulations ingested fuel data categorized into fuel models, a stylized categorical classification of fuel type, amount, and physical arrangement, using the 13-category Albini (1976) classification system as restated by Anderson (1982). Based on weather station data, dead fuel moisture content was set 5% and 12% for periods 1 and 2,

[5] http://nomads.ncdc.noaa.gov

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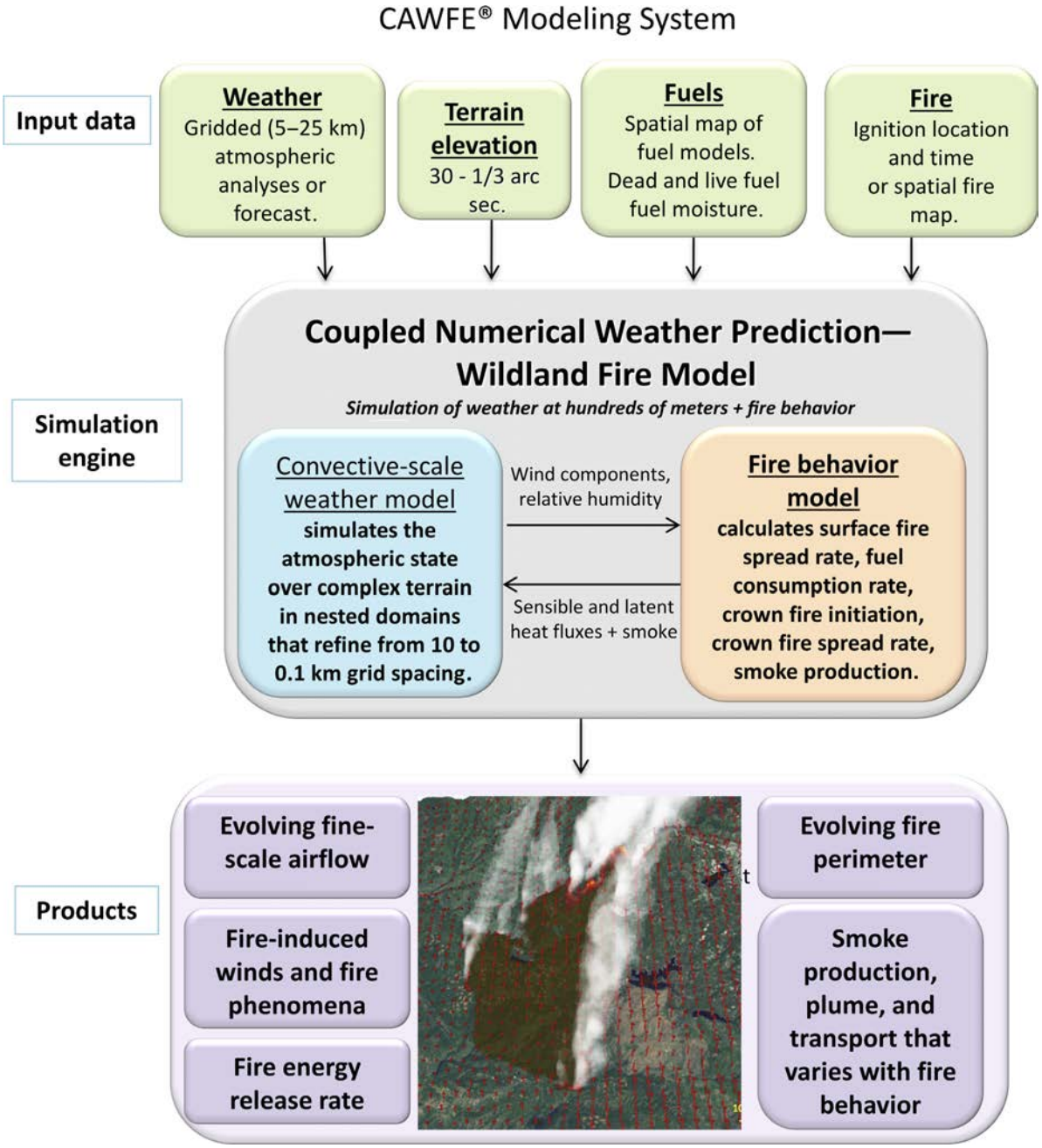

FIG. 2. Overview of the CAWFE modeling system.

respectively, each experiencing a diurnal increase and decrease of 1% (data *available online*).[6] Sensitivity experiments to test the effect of drought during period 1 varied the dead fuel moisture content (DFMC) from the measured 5% to its historical low (3%) and high (8%) and the live fuel moisture content (LFMC) from 120% in the control experiment to 90% and 150%, values that bracket the natural range from extreme drought to spring moisture values. Experiments to test the effect of fuel accumulation simultaneously halved the fuel load and depth, thus keeping the packing ratio constant, to represent preaccumulation surface fuel load. Other tests varied the canopy fuel load from the control experiment value of 1.11 to 3.33 kg/m^2. This was the most direct approach to test fuel accumulation; other effects on forest structure such as the accumulation of ladder fuels may also have occurred but are much more difficult to credibly implement and test.

Fuel data

Fuel models establish properties needed for the fire module algorithms including fuel load, fuel bed depth, surface area to volume ratio, and moisture of extinction. Two sources provided data mapping how fuel models varied in space. The

[6] http://mesowest.utah.edu

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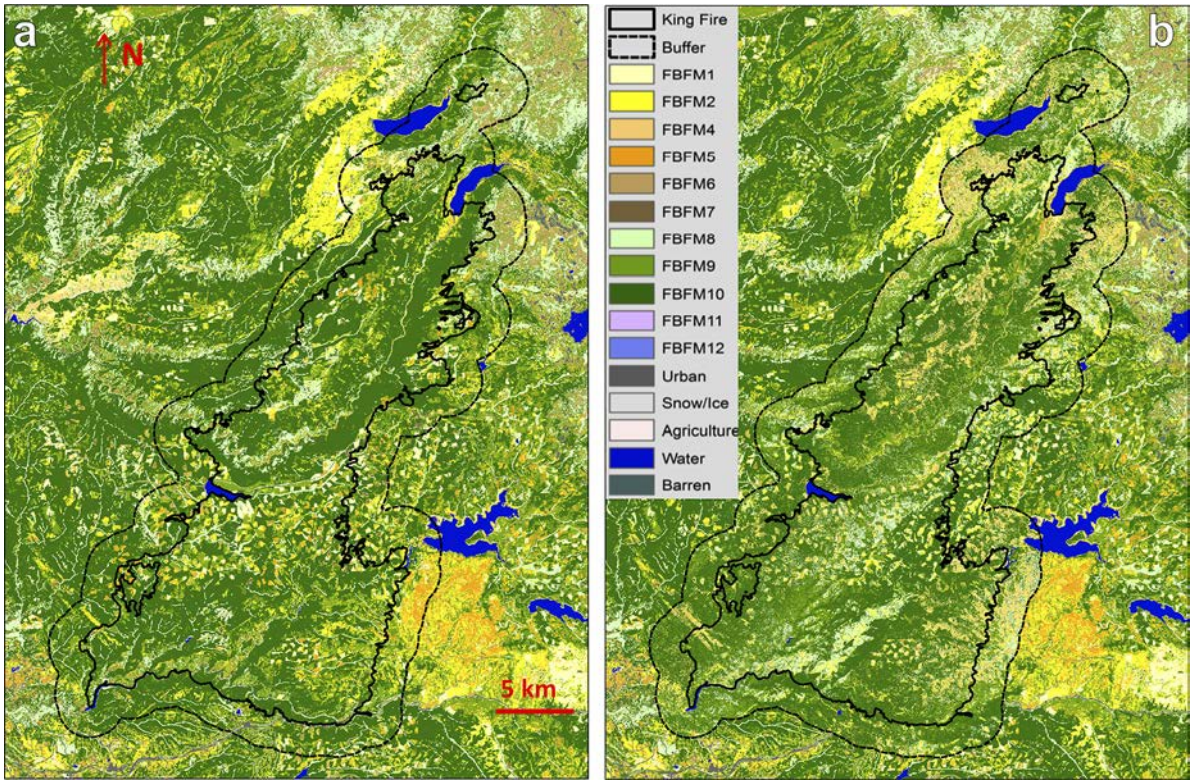

FIG. 3. Spatial variability in fuel models from LANDFIRE and remote sensing data. Fuel models classified according to the Anderson 13-category Fire Behavior Fuel Models (FBFM) system (Anderson 1982; FBFM1-FBFM3 are types of grasses, FBFM4-FBFM7 are shrubs, FBFM8-FBFM10 are forest litter from light to heavy, and FBFM11-FBFM13 are slash piles) from (a) LANDFIRE and (b) MapFUELS data (both reproduced from Stavros et al. (2018)). The heavy solid line indicates the King fire outline, and the thin black line indicates the area over which the analysis for defining MapFUELS fuel models was performed.

control experiment used 2012 fuel model data from the Landscape Fire and Resource Management Planning Tools Project (LANDFIRE) database available from the U.S. Department of Agriculture Forest Service and U.S. Department of Interior (Fig. 3a; data *available online*).[7] An alternative method (Stavros et al. 2018) called MapFUELS established maps of these fuel models using only remote sensing observations from the Airborne Visible Infrared Imaging Spectrometer (AVIRIS) to create a dominant vegetation map and clusters of structural metrics (Fig. 3b) from the Airborne Snow Observatory (ASO) light detection and ranging (LiDAR; Painter et al. 2016). MapFUELS data were derived from pre- and postfire airborne data (Stavros et al. 2016) and evaluated against forest inventory analysis field data. That analysis covered actual fire area plus a 2-km buffer. Differences were most apparent in areas varying from a natural state such as in dense plantation, harvested and replanted areas, and areas in transition such as the 1992 Cleveland burn scar in the southeast and the 2001 Star Fire west of Hell Hole Reservoir (Fig. 4). For both sources, data were resampled to model fuel cells (5 × 5 cells are within each atmospheric grid cell) using nearest-neighbor resampling. Standard fuel loads and other properties from (Anderson 1982) were used. In simulations using data from both sources, where a forest fuel type was indicated, the canopy fuel load uses the control experiment value of 1.11 kg/m^2.

[7] http://www.landfire.gov

RESULTS

Fire progression

We simulated two periods during the King Fire with the CAWFE coupled weather–wildland-fire model. Period 1 spanned 17:00 16 September to 19:45 18 September. During this time, the CAWFE simulation reproduced notable features of the fire event (Appendix S1: Video S1). These included weak-to-moderate southerly winds (Fig. 4a), multiple heading regions along the fire front (Appendix S1: Fig. S2), each pulling a section of the fire up a draw through fire-induced winds and creating a distinct smoke plume, the fire entering the Rubicon Canyon at approximately 13:00 (Fig. 4b), and the fire's 25 km run up canyon on the afternoon of 17 September (Fig. 4c) to Hell Hole Reservoir where growth diminished due to reaching the canyon's top, rockier terrain, and weaker ambient winds (Fig. 4d). VIIRS data (Fig. 5a) supported this sequence of events but indicated the flanks' simulated lateral growth was overestimated (Fig. 5b). This variance from actual outcomes may have occurred because the model neglected fire suppression, which was heavily applied to the western flank south of the Rubicon Canyon, because of deficiencies in identifying forest structure in prior disturbances (later discussed in *Sensitivity to spatial distribution of fuel models*), and inherent model error. Within the Rubicon Canyon, a narrow band of wind (Fig. 4b, c) channeled by the upward, concave valley shape contributed to the run. The heat released by the fire

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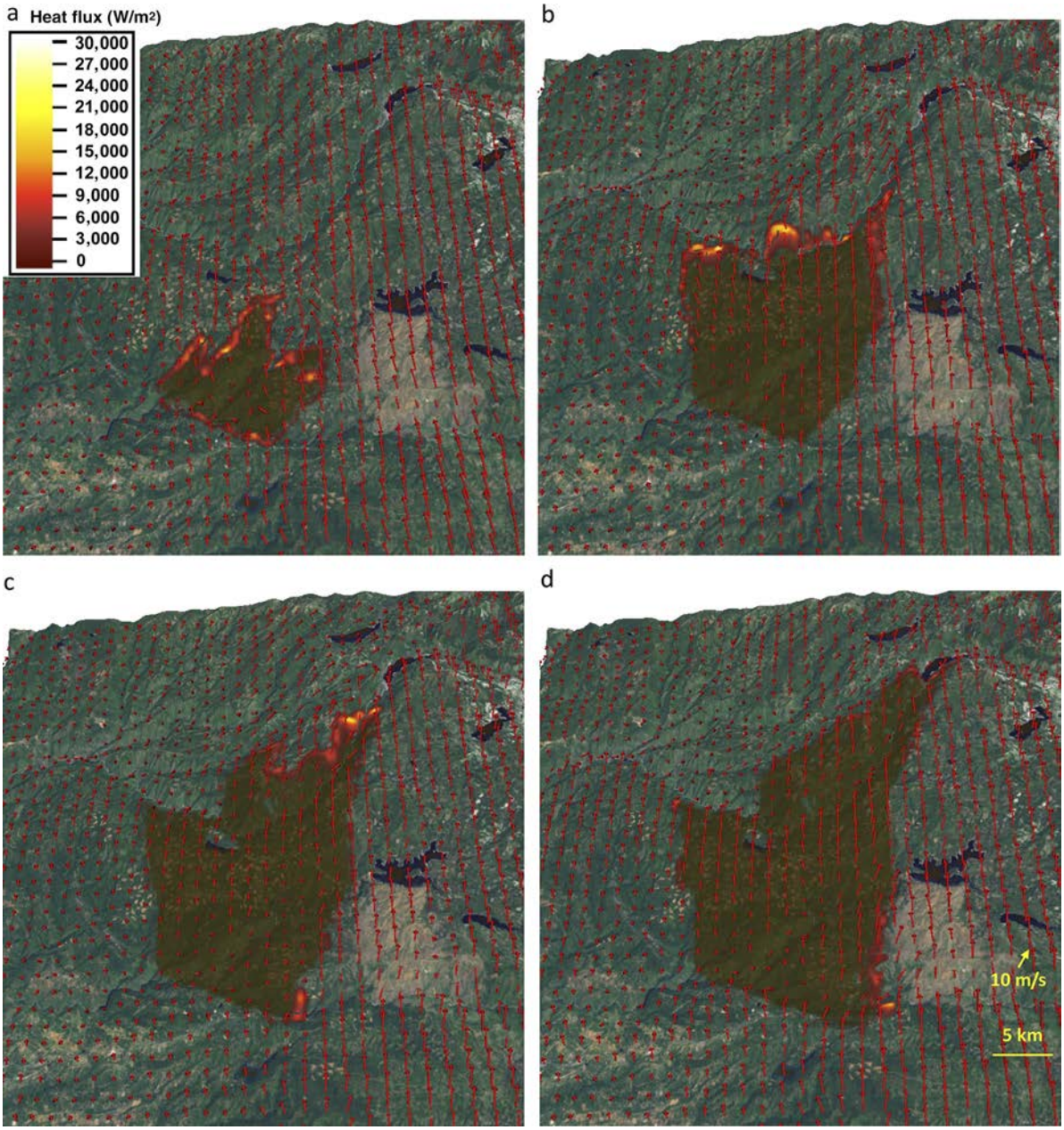

FIG. 4. Snapshots throughout the control simulation of the King Fire. Simulated total heat flux in domain 4 (colored according to key at right) with wind vectors (every fourth grid point) near the surface, at (a) 22:00 on 16 September, (b) 13:00 on 17 September, (c) 18:00 on 17 September, and (d) 23:00 on 17 September.

created a single, strong, downwind-leaning plume that drew air faster over the fire front, further accelerating the fire (later discussed in *Fire-induced winds*).

A pyrocumulus cloud was produced in the simulation for under 1 h at approximately 19:00 on 18 September (Appendix S1: Fig. S3), as the leading edge of the fire was approaching the top of the canyon. It occurred near the base of a moist layer that extended from 3 to 6 km above ground level. The fire plume increased the ambient relative humidity of approximately 60% at that height to saturation, forming trace amounts of cloud and rainwater. As the amount of liquid produced was small and this occurred late in the fire's run, it contributed little to simulated fire growth.

During period 2, from 21:00 on 18 September to 20:51 on 19 September, the fire was less active and spread slowly under moist easterlies. It crept outward along its flanks with active burning at the northern edge toward the west and higher intensity burning within 0.3 to 1 km wide lobes that were aligned with small drainages. These lobes lay under fire-produced convective cells that drew the fire up the drainages, which served as topographic "chimneys." The simulation (Fig. 6a) contained features seen in concurrent high spatial resolution (35-m pixel) thermal infrared data from MASTER (Moderate Resolution Imaging Spectroradiometer [MODIS]/Advanced Spaceborne Thermal Emission and Reflection Radiometer [ASTER] airborne prototype; Hook et al. 2001; Fig. 6b).

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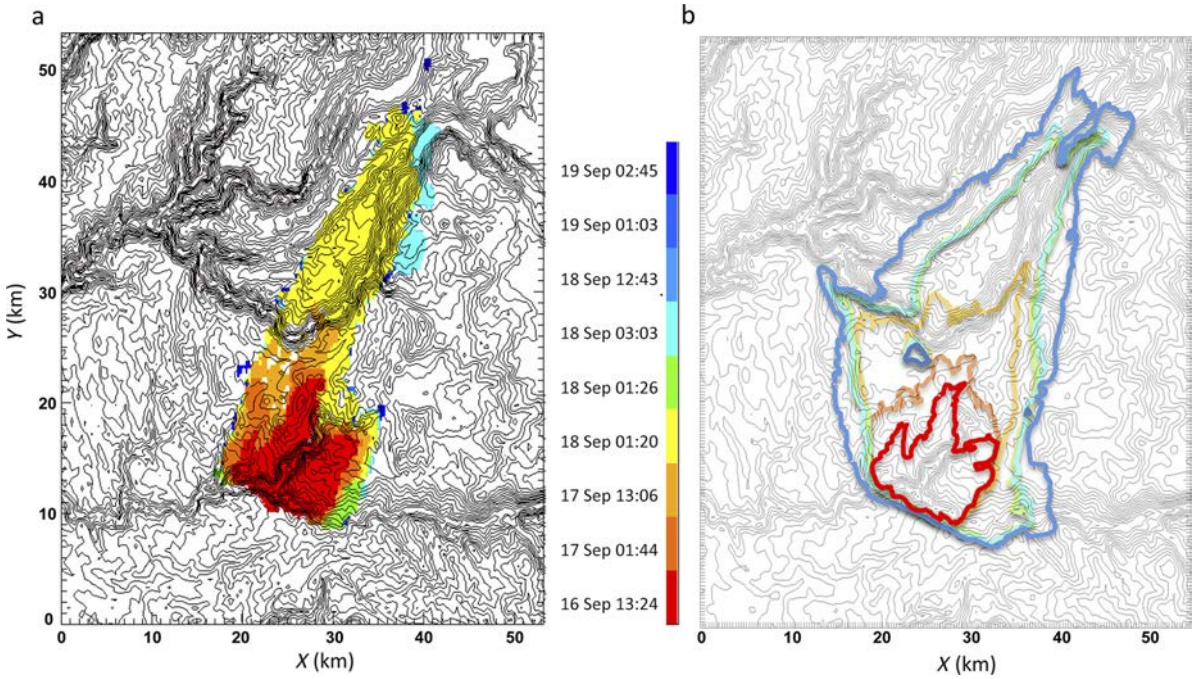

FIG. 5. Observed and simulated fire progression. (a) NIROPs extent used to initialize fire in progress (red) (21:49 on 16 September) and later VIIRS fire detections through 02:45 on 19 September. NIROPs data are distributed by the National Interagency Fire Center (https://ftp.nifc.gov). (b) Simulated fire extents at VIIRS detection times to 12:43 on 18 September, plotted with corresponding colors. Historical active fire detection data are distributed by the USDA Forest Service Active Fire Mapping Program (https://fsapps.nwcg.gov/afm/).

Fire-induced winds

Fire-induced winds were calculated using the difference between the west-east, south-north, and vertical wind components in the control simulation and corresponding fields in a simulation without a fire. At 22:00 on 16 September, as the fire drew itself up drainages in the rolling hills south of the Rubicon Canyon, the horizontal component of the fire-induced winds was 0–11.1 m/s, (Fig. 7a) on the order of the ambient winds, and the impact on the vertical wind component was −3.4 to 8.7 m/s (Fig. 7b). These perturbations appear as individual updraft plumes along the fire line, compensating downdrafts and inflow into the plumes, and outflow accelerated downwind to the north-northeast. Fire-induced winds were arranged differently at 16:20 on 17 September as the fire raced up canyon, when the horizontal winds in the fire's leading edges, those driving it up canyon, reached 12–13.7 m/s (Fig. 7c) and fire-induced vertical winds, located primarily in the plume leading the fire, ranged from −5.1 to 14.5 m/s (Fig. 7d), both exceeding ambient winds.

Sensitivity to drought

The control simulation used the 10 h DFMC at the Bald Mountain Remote Automated Weather Station (RAWS), which was measured at its historical average of 5% during the fire, similar to other nearby stations. The 10 h DFMC reflected the response of smaller fuel elements that spread a fire front to varying weather. Concurrently, exceptionally low moisture content was measured in larger dead fuel elements that respond over longer timescales that reflect the drought but these do not influence spread rate. Sensitivity experiments varied the DFMC using the historical low and high extremes of 3% and 8%, respectively. Fires in all three simulations traveled rolling hills to reach the Rubicon Canyon in the early morning of 18 September. The simulated fire for the observed DFMC arrived in 12 h at 17:00, while simulations with historical high (low) DFMC experiments arrived at the same time (1 h earlier), respectively (Fig. 8). Both the control and historical high DFMC simulations took 6.3 h to cross the Rubicon Canyon and begin their runs, while the historically low DFMC simulation crossed and began to climb at once. After each simulated fire began to climb, the race up canyon of experiments with 8%, 5%, and 3% DFMC took 16.7, 15.0, and 11.7 h, respectively. Faster moving simulated fires reached waypoints sooner but did not lead to a larger ultimate fire extent, the growth of which was restricted by rocky terrain at the top and slowed by deteriorating weather conditions as winds changed direction and weakened, humidity increased, and rain occurred over the area.

LFMC had the potential to influence fire behavior. Energy rising from a surface fire is used to heat and dry the canopy, and if the remaining energy flux exceeds a threshold, the canopy ignited. Thus, the barrier to igniting canopies with higher LFMC is higher. Contrarily, once ignited, the latent heat flux is higher, per kilogram fuel consumed, for higher LFMC, as water vapor contributes to the air's buoyancy, fueling stronger fire-induced winds, although the canopy fuel consumed may be lower. The difference in evolving fire extent or rate of spread, as expressed through CAWFE simulations, between experiments with LFMC of 90%, 120%, and 150%, effectively the natural range of values, was negligible (not shown). Differences in fire effects such as burn severity were not tested.

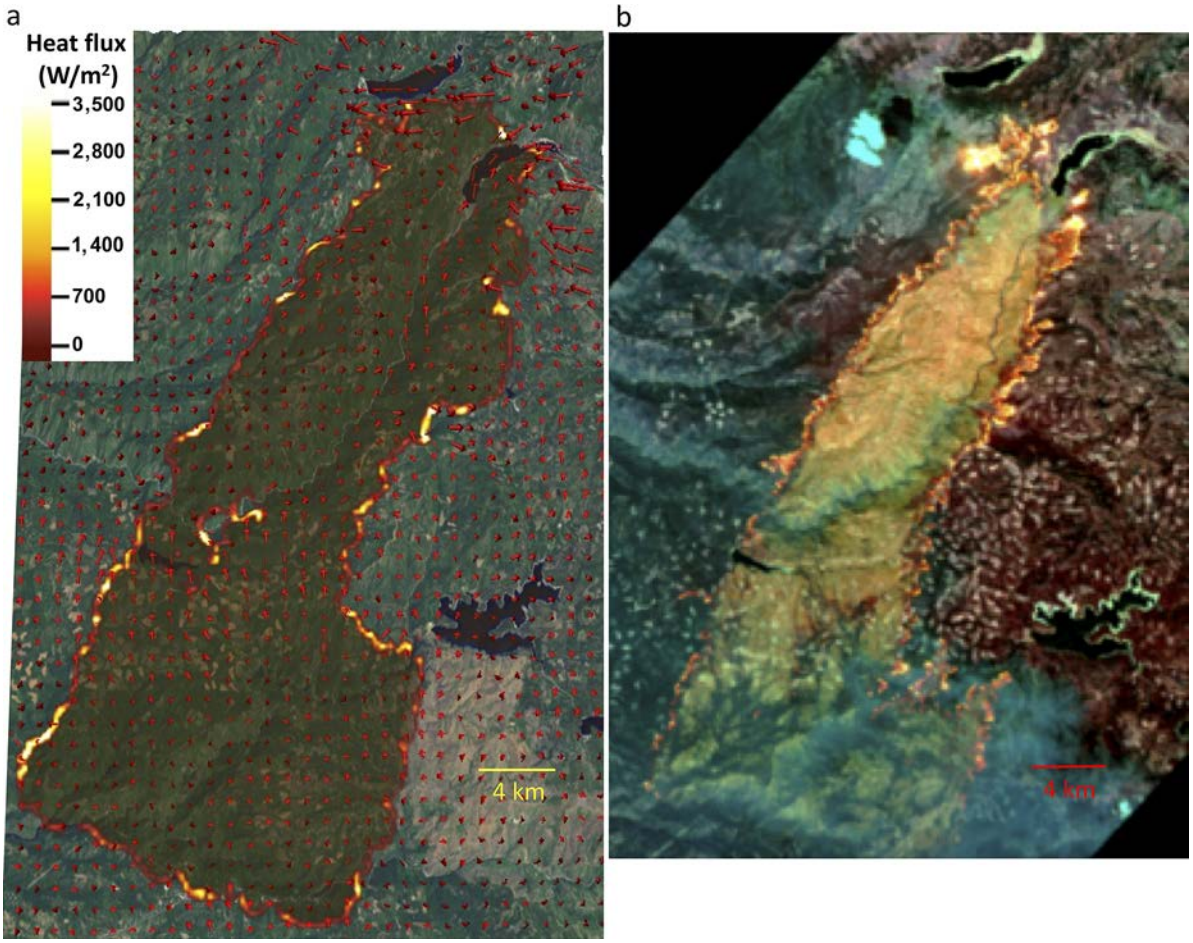

FIG. 6. Simulation and MASTER imagery of King Fire at 12:00 on 19 September. (a) Model simulation of King Fire at 12:00 on 19 September using LANDFIRE fuels at the time of (b) MODIS-ASTER (MASTER) airborne infrared imagery of the King Fire. Reproduced from Lee et al. (2015).

Sensitivity to fuel accumulation

We tested the effect of surface fuel accumulation due to fire suppression by comparing a simulation with standard conditions (the control) to a simulation with one-half the surface fuel load in one-half the depth (thereby keeping the packing ratio constant) to approximate fuels before accumulation. Increased fuel during the early growth period on rolling terrain extended the fire perimeter by up to 3 km. Fuel accumulation had much greater impact on inclined terrain, increasing fire extent by 16 km during the up-canyon run (Fig. 9), but although it accelerated fire spread, ultimately did not increase the final extent due to the topographic and weather constraints.

Unlike surface fuel load, which is input into the spread rate formula, the canopy fuel load does not directly affect the spread rate. However, the sensible and latent heat released by its consumption contribute to vertical motion as, when climbing sloped terrain, a component of the fire plume updraft lies along the surface in the direction of fire propagation; that is, the canopy fuel load can impact fire spread rate through fire-induced winds. Consistent with this rationale, increasing the canopy fuel load by a factor of three had little effect on early growth over rolling hills before reaching the Rubicon Canyon, but had more effect later on growth up the canyon, increasing fire extent by 12 km over the control by 24 h (Fig. 10). Again, this ultimately did not lead to a greater fire extent.

Sensitivity to spatial distribution of fuel models

To evaluate the effect of limitations with spatial maps of fuel models, we compared periods 1 and 2 of the control simulation, which used fuel models classified into the Anderson (1982) 13 fuel models from the fire management standard LANDFIRE database, against simulations using a fuel model map also classified into the Anderson 13 fuel models that was developed from a technique called MapFUELS (Stavros et al. 2018), which employs only remote sensing observations. Applied to the King Fire data set, MapFUELS fuel maps varied from LANDFIRE most clearly in areas with harvesting and replanting, recovering burn scars, or dense plantation (Fig. 3). CAWFE simulations using MapFUELS data experienced different fire behavior producing a narrower fire by correctly not spreading through harvested patches or into the Cleveland Fire scar, the successional recovery of which appears faster than indicated in LANDFIRE, and better predicting the fire's passage north to the Rubicon Canyon through harvested areas (Fig. 11). However, the MapFUELS simulation

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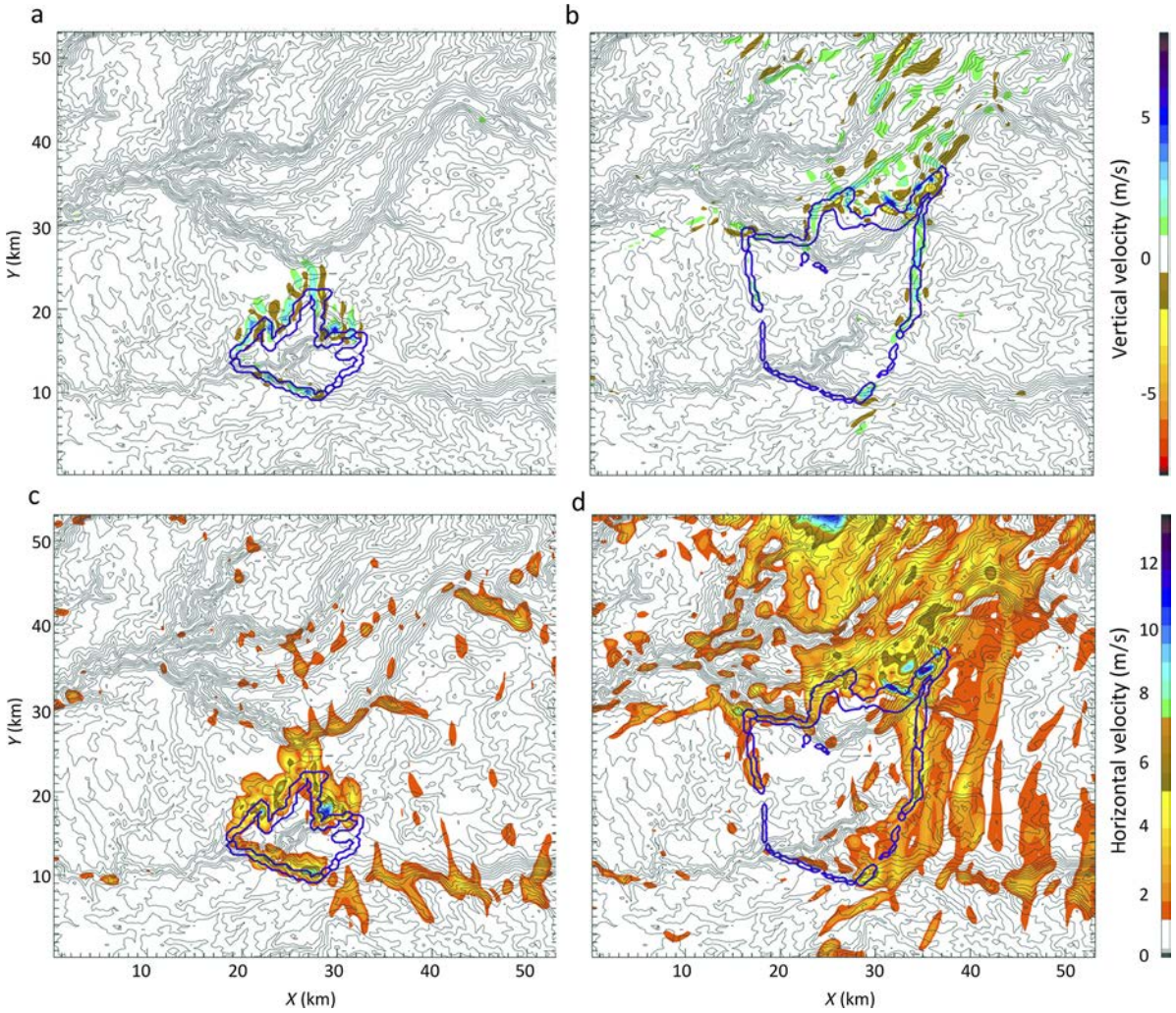

FIG. 7. Fire-induced winds. Fire-induced vertical (a, b) and horizontal (c, d) winds in m/s at 22:00 on 16 September (a, c) and 16:40 on 17 September (b, d).

produced too slow a run up the Rubicon Canyon and slightly exaggerated fire spread into the 2001 Star Fire scar, erroneously extending the fire by an additional 1–2 km. (Fig. 12).

Burn severity

Burn severity is distinct from instantaneous fire intensity (Keeley 2009) and is broadly defined as the degree to which fire has affected a site, a combined effect of fire intensity and residence time. Different severity metrics exist and depend on the medium being affected, for example, tree and shrub mortality, organic matter loss, or soil hydrologic impacts. The postfire Rapid Assessment of Vegetation Condition (RAVG) Composite Burn Index (CBI) severity assessment (distributed by the USDA Forest Service) represents the magnitude of fire-caused changes to the understory (grass and shrub layers), mid-story, and overstory (data *available online*).[8] The RAVG CBI showed that much of the Rubicon Canyon experienced high burn severity (Fig. 13a).

[8] https://apps.fs.usda.gov/arcx/rest/services/RDW_Wildfire/RAVG_CompositeBurnIndex/MapServer

Because CAWFE simulates a fire's intensity and heat flux to the atmosphere, we used total heat flux released over time at each point (related to the intensity of burning and integrated consumption over the residence time) as a proxy for severity for comparison with CBI. A visual comparison with results using LANDFIRE fuels (Fig. 13b) showed the simulated burn severity using MapFUELS fuels (Fig. 13c) better represented the extent and location of high severity areas.

DISCUSSION

Recent large, high-impact fires around the world have stimulated discussions that fire behavior has entered a new regime. Changing climate conditions that may create long-term drought and land management policies that emphasize fire exclusion leading to fuel accumulation are frequently cited as causes of large, severe fires. This is an intuitively obvious conclusion that is apparently supported by statistical studies that interpret correlations between atmospheric state variables or live fuel moistures and regional or national area burned as evidence of a causal relationship that can be repurposed to explain individual megafires. However, our work

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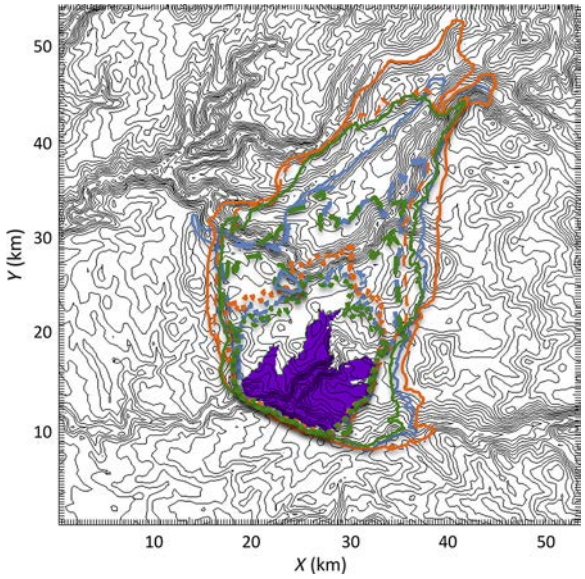

FIG. 8. Effect of dead fuel moisture content on fire evolution. The simulated evolution of fires with historical high (8%; green), low (3%; orange), and measured (5%; blue) dead fuel moisture content at 12 h (dotted line), 24 h (dashed line), and 36 h (solid line). The fire perimeter detected by NIROPs (purple) was introduced at 21:49 on 16 September.

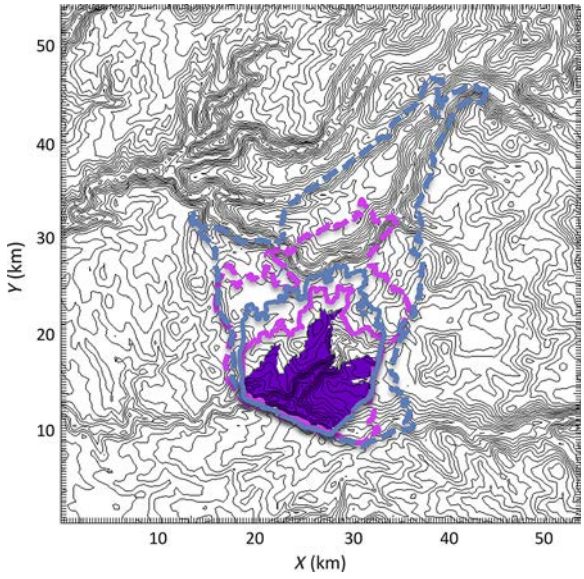

FIG. 9. Effect of surface fuel amount on fire evolution. The simulated evolution of fires with current surface fuel load and depth (blue) and with one-half the load and one-half the depth (pink), representative of conditions before fuel accumulation due to fire suppression, at 12 h (solid line) and 36 h (dashed line) into the simulation. The fire perimeter detected by NIROPs (purple) was introduced at 21:49 on 16 September.

suggests that the issue of what causes megafires and how future conditions will shape their frequency is not settled and should be critically re-examined from other perspectives.

Taking a different approach—that of a process study—this work used a physically based coupled NWP–wildland fire behavior model to reveal and examine the key processes underpinning the rapid growth and ultimate size of a specific megafire, the 2014 King Fire. More broadly, this study drew from fire behavior science to show the mechanisms through which both external and internally generated factors, with varying relative degrees of importance, drive any wildfire. Sensitivity experiments quantified how and to what degree drought and fuel accumulation contributed to this fire's behavior and how sensitive the results were to the type of fuel by using fuel maps derived solely from a unique set of remote sensing data, which, if applied in other settings, offer the potential to better monitor vegetation structure and composition.

We found that the CAWFE coupled weather–wildland-fire model reproduced the expanding fire extent and features documented by airborne and satellite observations, including an afternoon run during which the fire grew over 16,200 ha (40,000 acres) and other distinctive features. Results showed that the King Fire's growth primarily resulted from submesoscale winds within the Rubicon Canyon, beneath the resolution of sparse meteorological surface observation networks characteristic of remote areas or standard weather forecast models, and fire-induced winds that were on the order of or greater than ambient winds and enhanced by the convex canyon's upward tilt. While the fine-scale winds and fire-induced circulations were not detectable in widely spaced weather station data, the data used by macroscale statistical studies, nor were they captured in current operational fire growth tools that underestimated the growth, both were captured by CAWFE. Thus, while this megafire's behavior was not outside current understanding of fire behavior, it required a newer, coupled model to capture fire–atmosphere feedbacks and how the impacts of contributing factors can multiply through dynamic interactions—effects missing from all kinematic operational tools, including the different fire spread models used in the United States, Canada, and Australia. The perceived unpredictability of fires, which may merely reflect the limitations of current models, and notion that fire behavior is entering a new regime may reflect an increasingly dominant role of internal dynamics in driving fire behavior, supporting Alvarado et al.'s (1998) observation that megafires may behave differently than less extreme events.

There are broader implications. Fire behavior modeling is performed not only for fire management but also to support decision-making for preserving ecological resources, managing carbon emissions, establishing policy promoting forest resilience, and protecting endangered species habitat. So, rather than dismissing this underestimate by current operational tools of an extreme event as an anomaly, it is important to recall that the largest 1% of fires account for 80–96% of area burned (Strauss et al. 1989) and a disproportionately large portion of impacts. Understanding the mechanisms and actual contributing factors leading to megafires, and being able to model the full extent of outliers, is vital for shaping policy recommendations aimed at mitigating a disturbance dominated by extreme events.

Additional simulations isolated the contribution from fuel moisture—the primary path through which drought impacts fire behavior—and fuel amount, which is the most direct way to indicate how preventing fuel accumulation might have created a different outcome. We found that varying the surface dead fuel moisture content across its historical range had little impact on the rate of fire progression in the growth

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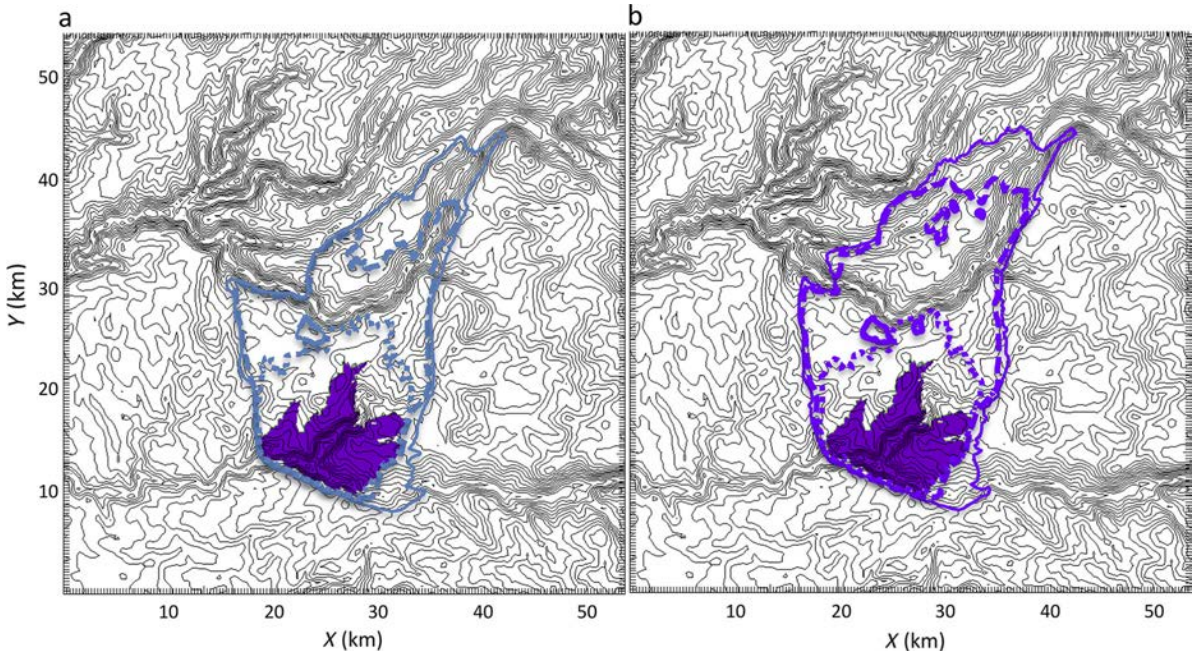

FIG. 10. Effect of canopy fuel load on fire evolution. The simulated evolution of fires with (a) current canopy fuel load and depth (blue) and with (b) three times the canopy fuel load (purple) at 12 h (dotted line), 24 h (dashed line), and 36 h (solid line). The fire perimeter detected by NIROPs (solid purple fill) was introduced at 21:49 on 16 September.

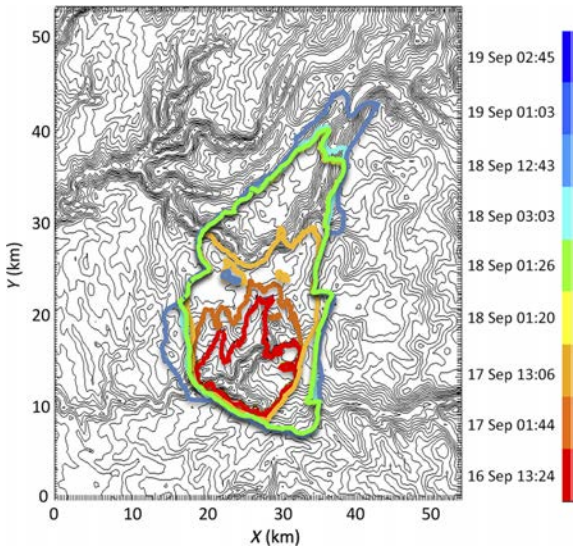

FIG. 11. Simulated fire evolution using remotely sensed fuel data. NIROPs extent used to initialize fire in progress at 21:49 on 16 September and simulated perimeters at later VIIRS fire detection times using MapFUELS-derived fuel type.

toward the Rubicon Canyon, where terrain was essentially flat. And, despite a prolonged drought reflected in live canopy fuel moisture and larger surface fuels, the dead fuel moisture content that impacts spread rate was measured as average from a historical perspective. In addition, it caused little difference. and in the case of live fuel moisture content, effectively no difference, in how fast the fire would have traveled up the Rubicon Canyon compared to historically high

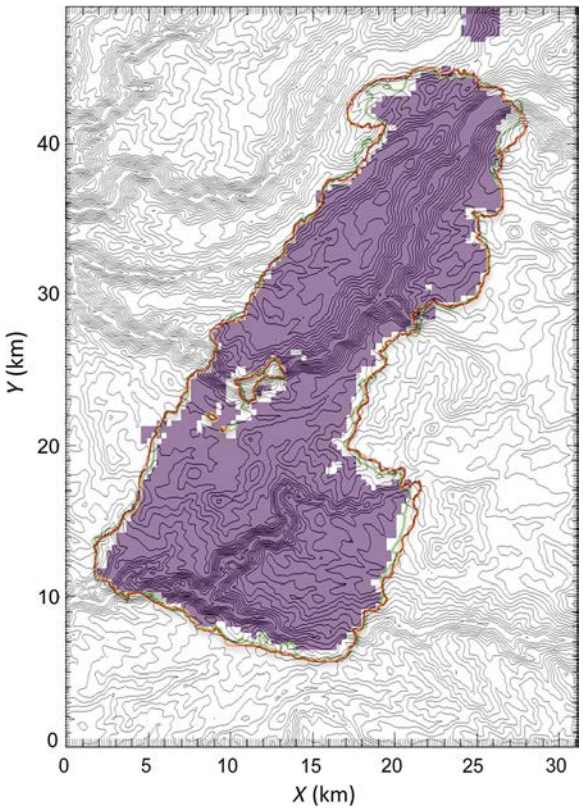

FIG. 12. Simulated fire evolution using two fuel sources and comparison to satellite active fire detection data. The VIIRS active fire map near the end of period 2 (purple), at 14:08 on 19 September. CAWFE simulated extent at the same time using LANDFIRE fuel model data (green) and MapFUELS-derived data (orange).

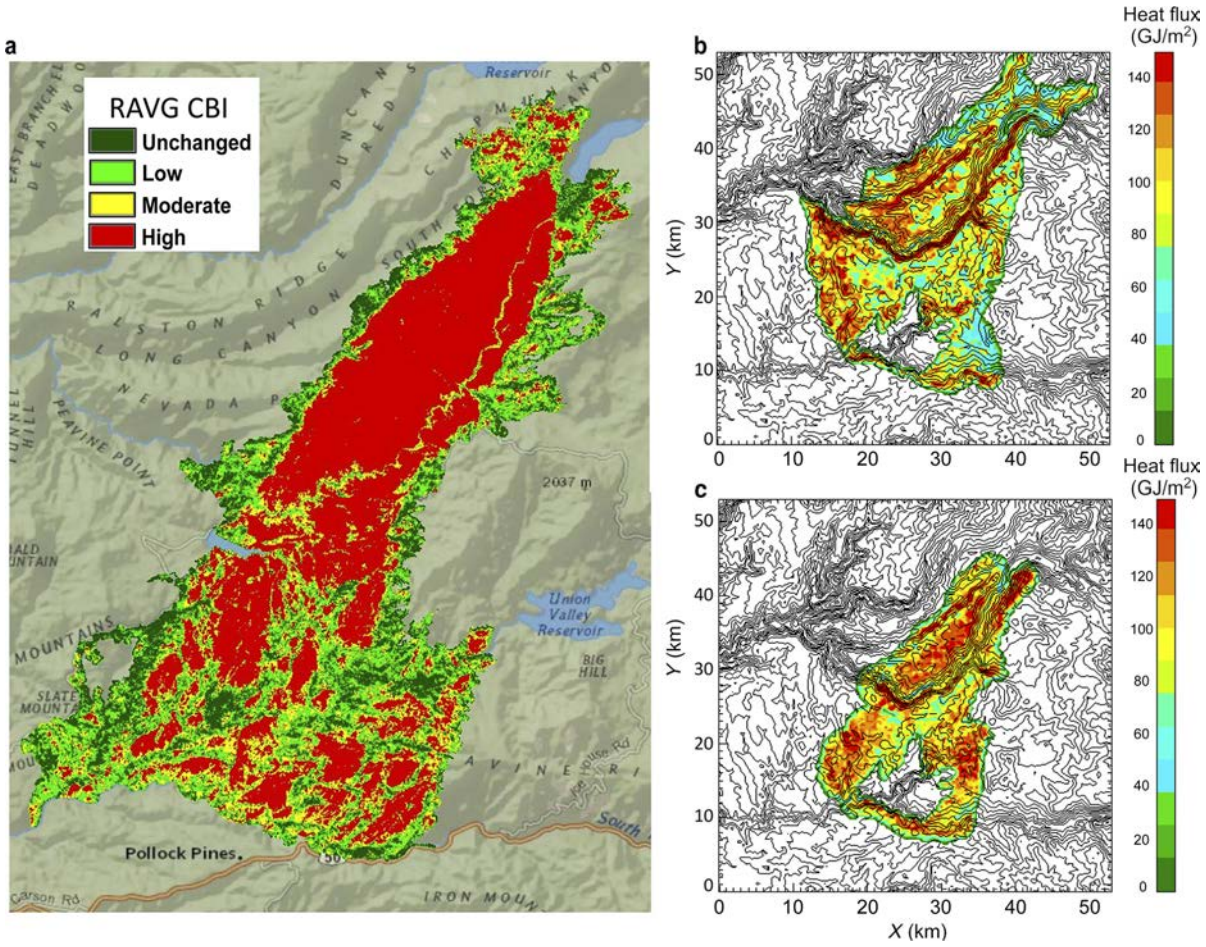

FIG. 13. Observed soil burn severity and simulated severity using fuel data from two sources. (a) Rapid Assessment of Vegetation Condition (RAVG) Composite Burn Index (CBI) severity product from the USDA Forest Service Geospatial Technology and Applications Center. Simulated sensible and latent heat flux summed over time at each point using (b) LANDFIRE and (c) MapFUELS fuel models.

fuel moisture conditions, suggesting drought contributed little to this fire's behavior throughout the event on its own. However, had dead fuel moisture content been at its historical low, the fire would have arrived at the canyon's top 3 h earlier—a change in behavior that could have had implications for suppression activity and personnel safety. Interestingly, although a faster moving simulated fire would have reached waypoints sooner, results suggested it would not have ultimately become a larger fire because growth was slowed by terrain at the canyon's top and constrained by weakening and shifting winds and increasing humidity and rain, a reflection of the complex terrain and episodic nature of weather periods that shape wildfire growth.

Intuitively, it seems that drought should increase fire rate of spread, a belief bolstered by regional or national correlations between drought indices and areas burned and indications of fuel moisture thresholds that trigger fire behavior (Dennison and Moritz 2009), but our outcomes and the limited mechanisms through which drought may influence a fire's spread rate (Appendix S1) show that drought's effect on surface and canopy fuels as represented in landscape-scale fire behavior models is secondary. The effect of drought on fuel moisture, which can have high spatial variability, may instead be more nuanced than directly influencing the rate of spread. For example, drought may sustain more ignitions or may assure the spatial continuity of sufficiently dry fuels to maintain fire spread across the landscape (M. Gill, *public communication*) and dehydrate fuel on sheltered, moister facets of terrain (Bradstock 2010).

The impact of fuel accumulation was also modulated by topography. Specifically, less fuel accumulation would have had little impact on the rate at which the King Fire spread across rolling terrain toward the Rubicon Canyon but would have slowed fire spread up the canyon. The fire would have consumed less fuel, produced lower heat fluxes and weaker updrafts, and thus caused weaker fire-induced winds. Likewise, experiments with greater canopy fuel load, which solely impact fire spread indirectly through additional heat fluxes that generate stronger fire-induced winds, increased fire spread rate only on inclined terrain. Because increased fuel amounts only accelerated the fire when climbing sloped terrain, fuel reduction efforts aimed at reducing some metrics of fire behavior could be focused on inclined terrain for maximum impact on fire behavior. This work complements studies (LaCroix et al. 2006, Finney 2007, Syphard et al. 2011, Dicus and Osborne 2015) that indicate how treatment patterns may be optimized at the landscape scale to obstruct wildfire growth. However, those conclusions should be re-examined

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with very-high-resolution coupled weather–fire models such as CAWFE that capture the fine-scale weather and fire-induced winds that can dominate extreme behavior and create outlier events that cause disproportionate impact.

This work found that both drought and fuel accumulation's impacts on the King Fire occurred primarily when the fire was burning in inclined terrain, where fuel amount and moisture dynamically compounded each other through the medium of fire-induced winds. That fire growth frequently occurs in complex terrain suggests this reinforcement effect on fire behavior by terrain could be widespread, and because of the implications, warrants further study and highlights the need to investigate climate and fuel impacts on fire behavior and effects jointly. In investigating a specific case, this work supports findings from statistical regression models relating climate factors to wildfire, for example, (Riley et al. 2013), that emphasize short-term indicators of drought (the rapidly responding dead fuel moisture content) more than long-term factors (such as live fuel moisture content). Simulations support studies that show short-term fire weather to be a significant predictor (Barbero et al. 2014), as weather windows enable and curtail fire growth. This suggests the cautionary point that in some conditions, for example, when a fire's expansion is limited by topography or the duration of a weather window favorable for growth, as in the King Fire, conditions can create instantaneously rapid spread rates and affect when a fire reaches its ultimate extent yet not have an opportunity to create a bigger fire.

We found that dead fuel moisture was a less significant factor in this case than winds and fire-induced winds, reinforcing previous conclusions (Coen and Schroeder 2015), that the degree to which changing fuel properties (either amount or dead fuel moisture) affect fire behavior is secondary to the spread rate's sensitivity to winds, when winds are significant. We suggest caution in interpreting studies that use statistical regression on variables such as wind measured at surface weather stations as this may misinterpret fire weather influence. This is because significant contributions come from wind patterns that occur at spatial scales finer than resolved by station data and from fire-induced winds, neither of which are reflected in meteorological data. However, these results do not contradict the macroscale statistical correlations between burned area and climate factors such as drought, because the macroscale correlations represent how these locally heterogeneous climate impacts would appear when summed over all fires over large areas.

In totality, this work—event simulations, sensitivity experiments, and synthesis of fire behavior studies—indicates that the events distinguishing the King fire in particular, and perhaps other megafires more generally, can be interpreted as arising through self-reinforcing, internal system dynamics (e.g., fire-generated winds) rather than from the direct effect imposed by individual external factors (e.g., drought, fuel accumulation, ambient wind). In both interpretations, the factors, various measures of fuel moisture and amount, wind, etc., affect the fire to varying degrees through their individual direct impacts on fire behavior. However, the escalation to another level of intensity, becoming a megafire, is possible in fires where factors fortuitously align and their effects amplify one another, manifesting as and feeding back on each other through dynamic effects such as fire-induced winds and airflow acceleration from topographic channeling or thermodynamics. But importantly, this interpretation allows that extreme behavior/high-impact fires need not arise from an extreme fire environment condition (either winds or fuels), as in the King fire, no individual environmental factor foretold megafire behavior. Further, varying individual fire behavior input parameters across their observed natural range did not make or break the megafire. This finding contradicts a widespread belief within the forestry community, partially generated by longtime use of kinematic fire spread models that omit dynamic feedbacks, that the energy needed to drive extreme fires requires exceptional amounts of burnable biomass, amounts exceeding those given by the Albini (1976) and Anderson (1982) surface fuel models and canopy fuel loads used here. In addition, this work casts doubt on the effectiveness of using predicted broad climate variables to explain and predict future megafire occurrence.

Fuel type and structure derived solely from an unprecedented set of airborne remote sensing data provided a more physically based representation of fuel models, and in conjunction with a physically based model, allowed attribution of various aspects of this fire's behavior to specific controls. Since this analysis depended on serendipitous collection of prefire data, this opportunity is not easily repeated, and so provides unique insights. Remote-sensing-derived fuel models generally improved simulations, notably in disturbed areas, which is important because megafires frequently encounter previous burn scars and managed lands that may impede or accelerate fire progression. The remote sensing-based fuels visually improved the simulated spatial distribution of burn severity, supporting studies that assert the importance of forest successional state on fire impacts (Lyons-Tinsley and Peterson 2012). Current analyses are limited to areas mapped by airborne missions and depend on availability of preburn data and resources to collect post-fire observations. Data from similar instrumentation, LiDAR and spectroscopy, on upcoming satellite remote sensing missions may expand the opportunity for such analyses (Dubayah et al. 2014, Jetz et al. 2016).

This approach and the different perspective it provides on the origin of the King megafire, and possibly megafires more generally, suggests several steps as part of a broad-based community path forward. These include broader use of coupled models to investigate fire behavior and revisiting conclusions made based on uncoupled models. A second step is developing widespread and regularly updated remote-sensing-based fuel mapping products, culminating in inclusion in community databases, as in Peterson et al. (2015b). Improved global forest structural, compositional, and moisture data could enable megafire growth and effects to be better predicted in the future. While progress has been made, as noted in Appendix S1, a third need is better understanding of crown fires, notably, collecting large enough samples to make stronger conclusions about how fuel properties and condition affect crown fire initiation, growth, and fire effects and continuing progress toward mapping canopy fuel moisture accurately with remote sensing data. Further pre-, during, and post-megafire observations, including unsaturated thermal infrared airborne observations, and coupled modeling studies are needed to better understand the internal dynamics of these events and their effects. Fourth, studies

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on the potential for future megafires in particular should perhaps be focused on the degree to which weather will be more episodic and have more frequent or longer multiday fire weather periods and how this coincides with changing ignition patterns rather than on broad climate variables and fire season length. Regional climate simulations are now being run at approximately 10 km grid spacing (Prein et al. 2013), and although these still do not explicitly resolve convective precipitation, they may indicate changing patterns. The scales influencing fires range over several orders of magnitude and it is not feasible to test all factors or all fires with one approach. Diverse methods, arising from different areas of expertise, each of which providing a unique, partial insight, are needed to unravel this important problem.

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Supporting Information

Additional supporting information may be found online at: http://onlinelibrary.wiley.com/doi/10.1002/eap.1752/full

Data Availability

Data available from NASA ORNL DAAC: https://doi.org/10.3334/ornldaac/1288

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esa ECOSPHERE

Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States?

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Abstract. There is a widespread view among land managers and others that the protected status of many forestlands in the western United States corresponds with higher fire severity levels due to historical restrictions on logging that contribute to greater amounts of biomass and fuel loading in less intensively managed areas, particularly after decades of fire suppression. This view has led to recent proposals—both administrative and legislative—to reduce or eliminate forest protections and increase some forms of logging based on the belief that restrictions on active management have increased fire severity. We investigated the relationship between protected status and fire severity using the Random Forests algorithm applied to 1500 fires affecting 9.5 million hectares between 1984 and 2014 in pine (*Pinus ponderosa*, *Pinus jeffreyi*) and mixed-conifer forests of western United States, accounting for key topographic and climate variables. We found forests with higher levels of protection had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading. Our results suggest a need to reconsider current overly simplistic assumptions about the relationship between forest protection and fire severity in fire management and policy.

Key words: biodiversity; climate; fire frequency; fire severity; fire suppression; Gap Analysis Program levels; logging; protected areas.

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Introduction

It is a widely held assumption among federal land management agencies and others that a lack of active forest management of some federal forestlands—especially within relatively frequent-fire forest types such as ponderosa pine (*Pinus ponderosa*) and mixed conifers—is associated with higher levels of fire severity when wildland fires occur (USDA Forest Service 2004, 2014, 2015, 2016). This prevailing forest/fire management hypothesis assumes that forests with higher levels of protection, and therefore less logging, will burn more intensely due to higher fuel loads and forest density. Recommendations have been made to increase logging as fuel reduction and decrease forest protections before wildland fire can be more extensively reintroduced on the landscape after decades of fire suppression (USDA Forest Service 2004, 2014, 2015, 2016). The concern follows that, in the absence of such a shift in forest management, fires are burning too severely and may adversely affect forest resilience (North et al. 2009, 2015, Stephens et al. 2013, 2015, Hessburg 2016). Nearly every fire season, the United States Congress introduces forest management legislation based on this view and aimed at increasing mechanical fuel treatments via intensive logging and weakened forest protections.

However, the fundamental premise for this fire management strategy has not been rigorously

tested across broad regions. We broadly assessed the influence of forest protection levels on fire severity in pine and mixed-conifer forests of the western United States with relatively frequent-fire regimes to test this assumption. We used vegetation burn severity data from all fires >405 ha over a three-decade period, 1984–2014, in forests with varying levels of protection.

Study area

Pine and mixed-conifer forests at low/mid-elevations, where historical fires were relatively frequent, are broadly distributed across several ecoregions in the western United States (Fig. 1; Appendix S1: Table S1). Although ponderosa pine often dominates these forests, they can also include Jeffrey pine (*Pinus jeffreyi*), which in places intermix with, and are similar to, ponderosa pine forests, and Madrean pine–oak (*Quercus* spp.) forests with a diversity of pines. Mixed-conifer forests at low/mid-elevations are also broadly distributed across multiple ecoregions (Fig. 1). They can include additional pines (e.g., lodgepole pine, *Pinus contorta*; sugar pine, *Pinus lambertiana*), true firs (*Abies* spp.), Douglas-fir (*Pseudotsuga menzeisii*), and incense-cedar (*Calocedrus decurrens*).

Methods

We used Gap Analysis Program (GAP) protection classes (USGS 2012), as described below, to determine whether areas with the most protection (i.e., GAP1 and GAP2) had a tendency to burn more severely than areas where intensive management is allowed (i.e., GAP3 and GAP4). We compared satellite-derived burn severity data for 1500 fires affecting 9.5 million hectares from years for which there were available data (1984–2014) among four different forest protection levels (Fig. 1), accounting for variation in topography and climate. We analyzed fires within relatively frequent-fire forest types comprised of pine and mixed-conifer forests mainly because these are the predominant forest types at low to mid-elevations in the western United States, there is a large data set on fire occurrence, and they have been a major concern of land managers for some time due to decades of fire suppression. We defined geographic extent of forest types from the Biophysical Settings data set (BpS) (Rollins 2009; *public communication*, http://www.landfire.gov) that derived forest maps from satellite imagery and represents plant communities based on NatureServe's Ecological Systems classification. Baker (2015) noted that some previous work found ~65% classification accuracy of this system with regard to specific forest types and, accordingly, he analyzed groups of related forest types in order to improve accuracy. We followed his approach (see Appendix S1: Table S1). The categories selected from the Biophysical Settings map were ponderosa/Jeffrey pine and mixed-conifer forest types with relatively frequent-fire regimes (e.g., Swetnam and Baisan 1996, Taylor and Skinner 1998, Schoennagel et al. 2004, Stephens and Collins 2004, Sherriff et al. 2014), compared to other forest types with different fire regimes such as high-elevation forests and many coastal forests not studied herein. Forest types in our study totaled 29.2 million hectares (Fig. 1; Appendix S1: Table S1). We used the BpS data to capture areas that were classified as forests before fire, because postfire vegetation maps can potentially show these same areas as temporarily changed to other vegetation types. We sampled our response and predictor variables on an evenly spaced 90 × 90 m grid within these forest types using ArcMap 10.3 (ESRI 2014). This created a data set of 5,580,435 independent observations from which we drew our random samples to create our models. The 90-m spacing was chosen because it was the smallest spacing of points that was computationally practical with which to operate.

Fires

The Monitoring Trends in Burn Severity project (MTBS, *public communication*, http://www.mtbs.gov) is a U.S. Department of Interior and Department of Agriculture-sponsored program that has compiled burn severity data from satellite imagery, which became available in 1984, for fires >405 ha, and was current up to 2014 (Eidenshink et al. 2007). The MTBS Web site allows bulk download of spatial products that include two closely related indices of burn severity: differenced normalized burn ratio (dNBR) (Key and Benson 2006) and relative differenced normalized burn ratio (RdNBR) (Miller and Thode 2007). Both indices are calculated from Landsat TM and ETM satellite imagery of reflected light from the earth's surface at infrared wavelengths from before and after fire to

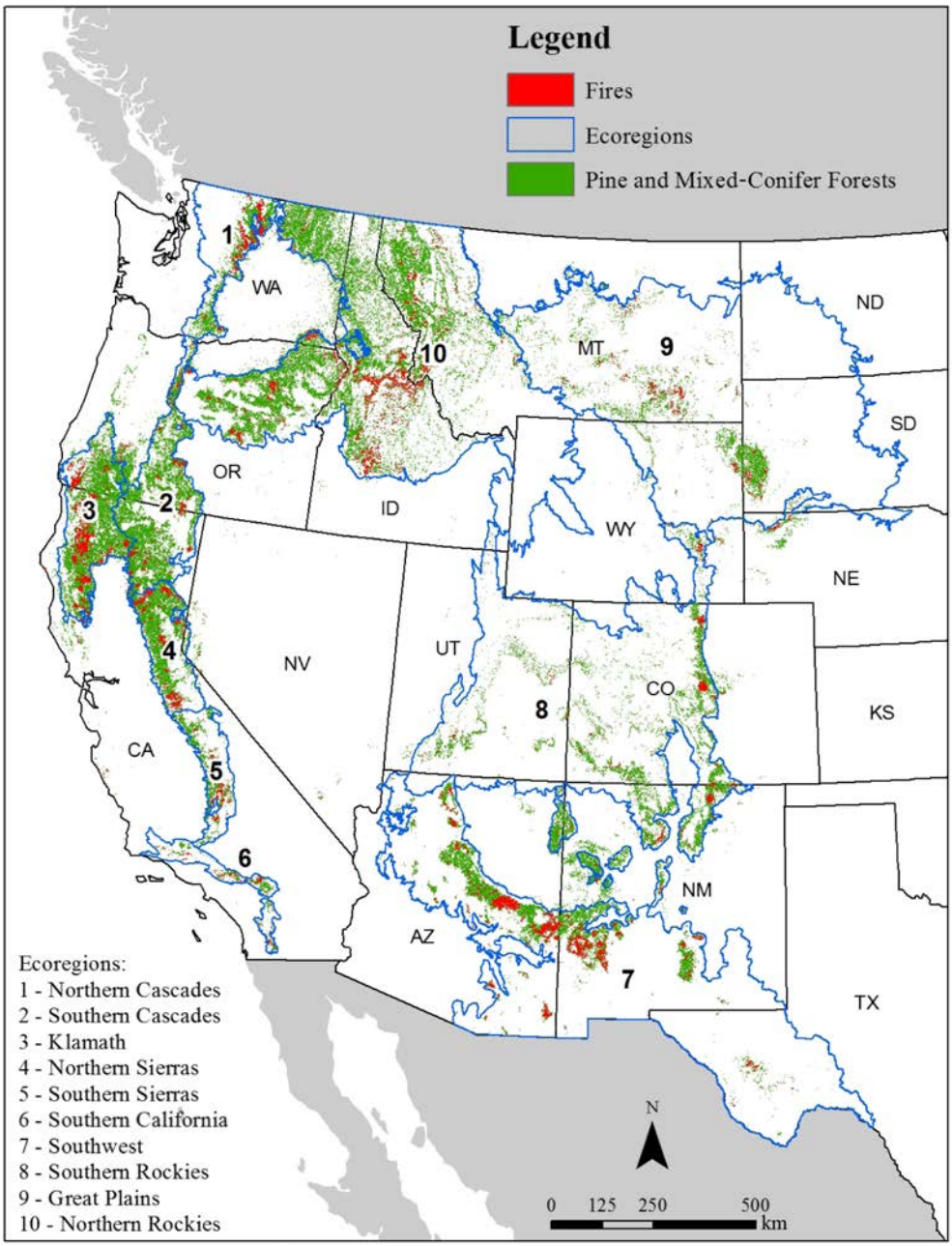

Fig. 1. Pine and mixed-conifer forests, fires, and ecoregions analyzed in this study.

measure associated changes in vegetation cover and soil characteristics. We defined burn severity with the RdNBR index because it adjusts for prefire conditions at each pixel and provides a more consistent measure of burn severity than dNBR when studying broad geographic regions with many different vegetation types (Miller et al. 2009*a*, Norton et al. 2009). RdNBR values typically range from negative 500 to 1500 with values further away from zero representing greater change from prefire conditions. Negative values represent vegetation growth and positive values increasing levels of overstory vegetation mortality. The RdNBR values could be used to classify

fires into discrete burn severity classes of low, medium, and high but this was not performed in our study, as we desired to have a continuous response variable in our models.

We intersected forest sampling points with fire perimeters downloaded from MTBS to determine fires that occurred in our analysis area, and censored fires with <100 sampling points (81 ha). The remaining points represented sampling locations from 2069 fires (Fig. 1). We extracted RdNBR values at each sampling point as our response variable as well as predictor variables that included topography, geography, climate, and GAP status. These sampling points were used to investigate the relationship between forest protection levels and burn severity (Appendix S1: Tables S2 and S3). We chose topographic and climatic variables based on previous studies that quantified the relationship between burn severity, topography, and climate (Dillon et al. 2011, Kane et al. 2015).

Topographic and climatic data

To account for the effects of topographic and climatic variability, we derived several topographic indices (Appendix S1: Table S2) from seamless elevation data (*public communication*, http://www.landfire.gov/topographic.php) downscaled to 90-m^2 spatial resolution due to computational limits when intersecting sampling points. These indices capture categories of topography, including percentage slope, surface complexity, slope position, and several temperature and moisture metrics derived from aspect and slope position. We used the Geomorphometry and Gradient Metrics Toolbox version 2.0 (*public communication*, http://evansmurphy.wix.com/evansspatial) to compute these metrics. We also computed several temperature and precipitation variables (Appendix S1: Table S3) by downloading climatic conditions for each month from 1984 to 2014 from the PRISM climate group (*public communication*, http://prism.oregonstate.edu). Climate grids record precipitation and minimum, mean, and maximum temperature at a 4-km grid scale created by interpolating data from over 10,000 weather stations. To determine the departure from average conditions, we subtracted each climate grid by its 30-yr mean monthly value. These "30-yr Normals" data sets were also downloaded from the PRISM Web site and reflected the mean values from the most recent full decades (1981–2010). We determined mean seasonal values with summer defined as the mean of July, August, and September of the year before a given fire; fall being the mean of October, November, and December of the previous year; winter the mean of January, February, and March of the current year of a given fire; and spring the mean of April, May, and June of the current year.

Protected area status and ecoregion classification

We used the Protected Areas Database of the United States (PAD-US; USGS 2012) to determine forest protection status, which is the U.S. official inventory of protected open space. The PAD-US includes all federal and most State conservation lands and classifies these areas with a GAP ranking code (see map at: http://gis1.usgs.gov/csas/gap/viewer/padus/Map.aspx). The GAP status code (herein referred to interchangeably as GAP class or protection status) is a metric of management to conserve biodiversity with four relative categories. GAP1 is protected lands managed for biodiversity where disturbance events (e.g., fires) are generally allowed to proceed naturally. These lands include national parks, wilderness areas, and national wildlife refuges. GAP2 is protected lands managed for biodiversity where disturbance events are often suppressed. They include state parks and national monuments, as well as a small number of wilderness areas and national parks with different management from GAP1. GAP3 is lands managed for multiple uses and are subjected to logging. Most of these areas consist of non-wilderness USDA Forest Service and U.S. Department of Interior Bureau of Land Management lands as well as state trust lands. GAP4 is lands with no mandate for protection such as tribal, military, and private lands. GAP status is relevant to the intensity of both current and past managements.

We made one modification to GAP levels by converting Inventoried Roadless Areas (IRAs) from the 2001 Roadless Area Conservation Rule (S_USA.RoadlessArea_2001, *public communication*, http://data.fs.usda.gov/geodata/edw/datasets.php) to GAP2 unless these areas already were defined as GAP1. We considered most IRAs as GAP2 given they are prone to policy changes and because they allow for certain limited types of logging (e.g., removal of predominately small trees for fuel reduction in some circumstances).

However, we note that very little logging has occurred within IRAs since the Roadless Rule, although there occasionally have been proposals to log portions of some IRAs pre- and postfire, and fire suppression often occurs.

We modified level III ecoregions (U.S. Environmental Protection Agency (EPA) 2013) to create areas of similar climate and geography (Fig. 1). We did this by extracting ecoregions and combining adjacent provinces in our study region.

Random Forests analysis

We investigated the relationship between protection status and burn severity using the data-mining algorithm Random Forests (RF) (Breiman 2001) with the "randomForestSRC" add-in package (Ishwaran and Kogalur 2016) in R (R Core Team 2013). This algorithm is an extension of classification and regression trees (CART) (Breiman et al. 1984) that recursively partitions observations into groups based on binary rule splits of the predictor variables. The main advantage of using RF in our study is that it can work with spatially autocorrelated data (Cutler et al. 2007). It can also model complex, nonlinear relationships among variables, makes no assumption of variable distributions (Kane et al. 2015), and produces accurate predictions without overfitting the available data (Breiman 2001).

Our independent observations were a random subset of our 5.5 million points, from which we drew three random samples of 25,000 points each. Each sample consisted of 500 fires randomly selected without replacement from the pool of 2069 fires. Fifty points were then randomly selected within each of the 500 fires. Our dependent variables were all continuous (Appendix S1: Tables S2 and S3) except for the main variable of interest, protected area status, which included the four GAP levels. The three observation samples were used to create three RF model runs, each consisting of 1000 regression trees. We conducted three RF model runs to assess whether our random samples of 25,000 points produced fairly consistent results.

The RF algorithm samples approximately 66% of the data to build the regression trees, and the remaining data are used for validation and to assess variable importance. We used this validation sample to determine the amount of variance explained and variable importance. The algorithm also produces individual variable importance measures by calculating differences in prediction mean-square-error before and after randomly permuting each dependent variable's values. Variable importance is a measure of how much each variable contributes to the model's overall predicative accuracy.

Unlike linear models, RF does not produce regression coefficients to examine how a change in a predictor variable affects the response variable. The analogy to this in RF is the partial dependence plot which is a graphical depiction of how the response will change with a single predictor while averaging out the effects of the other predictors, such as the climatic and topographic variables (Cutler et al. 2007). We used this approach, in addition to using RF to determine overall variable importance as described above, in order to determine the effect of GAP status, in particular, on fire severity, while averaging out effects of climate and topography.

Mixed-effects analysis

We performed a linear mixed-effects analysis using the "nlme" add-on package in R (Pinheiro et al. 2015). We used a random intercept model and identified year of fire (n = 31) and ecoregion (n = 10) as random effects. Similar to our RF models, our independent observations were a random subset of our 5.5 million points but for these models we drew three random samples of 50,000 points each. Each sample consisted of 500 fires randomly selected without replacement, and within each of those fires, 100 points were randomly selected. Our dependent variables were the same used in our RF models, and we log-transformed the non-normal variables of slope, surface roughness, and topographic radiation aspect index. We removed dependent variables that were correlated with each other (Pearson's $r > 0.5$), retaining 21 of 45 candidate dependent variables, and centered these on their means. Model reduction was performed in a stepwise process using bidirectional elimination with Bayesian information criterion selection criterion.

Spatial autocorrelation analysis

Spatial autocorrelation (SA) is the measure of similarity between pairs of observations in relationship to the distance between them. Ecological variables are inherently autocorrelated because

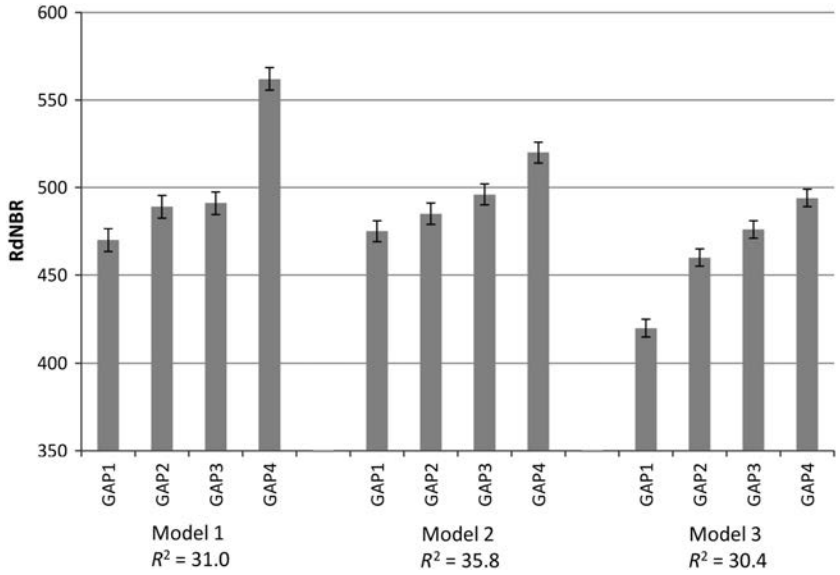

Fig. 2. Random Forests partial dependence of protection status vs. RdNBR burn severity for each model (n = 25,000). The variance explained is shown as pseudo R^2.

landscape attributes that are closer together are often more similar than those that are far apart.

We assessed the SA in the Pearson residuals with inspection of Moran's I autocorrelation index using the "APE" package add-in in R (Paradis et al. 2004) after removing points that shared the same x and y coordinates. Moran's I is an index that ranges from −1 to 1 with the sign of the values indicating strength and direction of SA. Values close to zero are considered to have a random spatial pattern. Our mixed-effects models all had a Moran's I values statistically different from 0 at the 95% confidence level ($P < 0.001$) so we included a spatial correlation structure in our model using the "nlme" package in R. Of Gaussian, exponential, linear, and spherical spatial correlation structures, we determined that the exponential structure produced the lowest Akaike's information criterion (AIC). Despite these additions, our second measurements still found relatively small, but significant, autocorrelation (Moran's I for model runs 1, 2, 3 = 0.10, 0.08, 0.10, all $P < 0.001$).

Results

With regard to ranking of variables in the model runs, variable importance plots from the three RF model runs show that protection status was consistently ranked as one of the 10 most important of the 45 variables in explaining burn severity (Appendix S1: Table S4). The most important variable explaining burn severity was ecoregion for models 1 and 2 and maximum temperature from the previous fall for model 3.

With regard to the GAP status variable in particular, after averaging out the effects of climatic and topographic variables, the RF partial dependence plots show an increasing trend of fire severity with decreasing protection status (Fig. 2). Fires in GAP4 had mean RdNBR values greater than two standard errors higher than all other GAP levels. Fires in GAP3 had mean RdNBR values two standard errors higher than GAP1 in all model runs. GAP3 differences with GAP2 were less pronounced with only one model showing differences greater than two standard errors. Fires in GAP1 were consistently the least severe, being two standard errors less than GAP3 in all model runs and two standard errors less than GAP2 in two of three model runs.

Our mixed-effects models validated these findings with similar results (Fig. 3, Appendix S1: Table S5). Like our RF models, our linear mixed-effects models showed GAP4 fires to have significantly higher RdNBR values and GAP1 fires to have significantly lower RdNBR values when compared to all other GAP classes. Fires in GAP

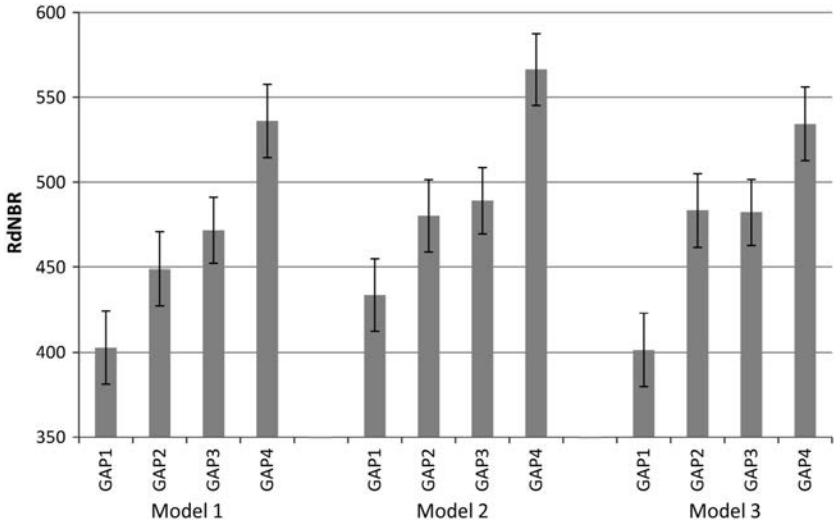

Fig. 3. Linear mixed effects models of protection status vs. RdNBR burn severity (n = 50,000).

status levels 2 and 3 were not significantly different in the mixed-effects models. Although the level of autocorrelation was significant, it was small in our model (Moran's I ~0.1) and not enough to account for such a substantial difference in burn severity among protection classes.

Discussion

Protected forests burn at lower severities

We found no evidence to support the prevailing forest/fire management hypothesis that higher levels of forest protections are associated with more severe fires based on the RF and linear mixed-effects modeling approaches. On the contrary, using over three decades of fire severity data from relatively frequent-fire pine and mixed-conifer forests throughout the western United States, we found support for the opposite conclusion—burn severity tended to be higher in areas with lower levels of protection status (more intense management), after accounting for topographic and climatic conditions in all three model runs. Thus, we rejected the prevailing forest management view that areas with higher protection levels burn most severely during wildfires.

Protection classes are relevant not only to recent or current forest management practices but also to past management. Millions of hectares of land have been protected from logging since the 1964 Wilderness Act and the 2001 Roadless Rule, but these areas are typically categorized as such due to a lack of historical road building and associated logging across patches >2000 ha, while GAP3 lands, for instance, such as National Forests lands under "multiple use management," have generally experienced some form of logging activity over the last 80 yr.

We expect that the effects of historic logging from nearly a century ago to gradually lessen over time, as succession and natural disturbance processes reestablish structural and compositional complexity, but it was beyond the scope of this study to attempt to assess the relative role of recent vs. historical logging. Similarly, industrial fire suppression programs that intensified in the 1940s influenced fire extent across forest protection classes. While more recent let-burn policies have been applied in GAP1 and GAP2 forests in some circumstances, evidence indicates that protected forests nevertheless remain in a substantial fire deficit, relative to the prefire suppression era (Odion et al. 2014, 2016, Parks et al. 2015). Thus, we believe it is unlikely that recent decisions to allow some backcountry fires to burn, largely unimpeded, account for much of the differences in fire severity among protection classes that we found, simply because such let-burn policies have not been extensive enough to remedy the ongoing fire deficit.

While forests in different protection classes can vary in elevation, with protected forests often occupying higher elevations, our results indicate that protection class itself produced notable

differences in fire severity after averaging out the effects of elevation and climate (see Fig. 2 and *Results* above). In our study, GAP1 forests were 284 m on average higher in elevation than GAP4 forests, while GAP1 forests experienced lower fire severity. This is the opposite of expectations if elevation was a key influence because higher elevation forests are associated with higher fire severity (see, e.g., Schoennagel et al. 2004, Sherriff et al. 2014). We note that we are not the first to determine that increased fire severity often occurs in forests with an active logging history (Countryman 1956, Odion et al. 2004).

Prevailing forest–fire management perspectives vs. alternative views

An extension of the prevailing forest/fire management hypothesis is that biomass and fuels increase with increasing time after fire (due to suppression), leading to such intense fires that the most long-unburned forests will experience predominantly severe fire behavior (e.g., see USDA Forest Service 2004, Agee and Skinner 2005, Spies et al. 2006, Miller et al. 2009*b*, Miller and Safford 2012, Stephens et al. 2013, Lydersen et al. 2014, Dennison et al. 2014, Hessburg 2016). However, this was not the case for the most long-unburned forests in two ecoregions in which this question has been previously investigated—the Sierra Nevada of California and the Klamath-Siskiyou of northern California and southwest Oregon. In these ecoregions, the most long-unburned forests experienced mostly low/moderate-severity fire (Odion et al. 2004, Odion and Hanson 2006, Miller et al. 2012, van Wagtendonk et al. 2012). Some of these researchers have hypothesized that as forests mature, the overstory canopy results in cooling shade that allows surface fuels to stay moister longer into fire season (Odion and Hanson 2006, 2008). This effect may also lead to a reduction in pyrogenic native shrubs and other understory vegetation that can carry fire, due to insufficient sunlight reaching the understory (Odion et al. 2004, 2010).

Another fundamental assumption is that current fires are becoming too large and severe compared to recent historical time lines (Agee and Skinner 2005, Spies et al. 2006, Miller et al. 2009*b*, Miller and Safford 2012, Stephens et al. 2013, Lydersen et al. 2014, Dennison et al. 2014, Hessburg 2016). However, others have shown that this is not the case for most western forest types. For instance, using the MTBS (www.mtbs.gov) data set, Picotte et al. (2016) found that most vegetation groups in the conterminous United States exhibited no detectable change in area burned or fire severity from 1984 to 2010. Similarly, Hanson et al. (2009) found no increase in rates of high-severity fire from 1984 to 2005 in dry forests within the range of the northern spotted owl (*Strix occidentalis caurina*) based on the MTBS data set. Using reference data and records of high-severity fire, Baker (2015) found no significant upward trends in fire severity from 1984 to 2012 across all dry western forest regions (25.5 million ha), nearly all of which instead were too low or were within the range of historical rates. Parks et al. (2015) modeled area burned as a function of climatic variables in western forests and non-forest types, documenting most forested areas had experienced a fire deficit (observed vs. expected) during 1984 to 2012 that was likely due to fire suppression.

Whether fires are increasing or not depends to a large extent on the baseline chosen for comparisons (i.e., shifting baseline perspective, Whitlock et al. 2015). For instance, using time lines predating the fire suppression era, researchers have documented no significant increases in high-severity fire for dry forests across the West (Williams and Baker 2012*a*, Odion et al. 2014) or for specific regions (Williams and Baker 2012*b*, Sherriff et al. 2014, Tepley and Veblen 2015). Future trends, with climate change and increasing temperatures, may be less simple than previously believed, due to shifts in pyrogenic understory vegetation (Parks et al. 2016).

This is more than just a matter of academic debate, as most forest management policies assume that fire, particularly high-severity fire, is increasing, is in excess of recent historical baselines, and needs to be reduced in size, intensity, and occurrence over large landscapes to prevent widespread ecosystem damages (policy examples include USDA Forest Service 2002, Healthy Forests Restoration Act 2003, USDA Forest Service 2009, HR 167: Wildfire Disaster Funding Act 2015). However, large fires (landscape scale or the so-called megafires) produce myriad ecosystem benefits underappreciated by most land managers and decision-makers (DellaSala and Hanson 2015*a*, DellaSala et al. 2015). High-severity fire

patches, in particular, provide a pulse of "biological legacies" (e.g., snags, down logs, and native shrub patches) essential for complex early seral associates (e.g., many bird species) that link seral stages from new forest to old growth (Swanson et al. 2011, Donato et al. 2012, DellaSala et al. 2014, Hanson 2014, 2015, DellaSala and Hanson 2015*a*). Complex early seral forests are most often logged after fire, which, along with aggressive fire suppression, exacerbates their rarity and heightens their conservation importance (Swanson et al. 2011, DellaSala et al. 2014, 2015, Hanson 2014).

Limitations

One limitation of our study is that, due to the coarseness of the management intensity variables that we used (i.e., GAP status), we cannot rule out whether low intensities of management decreased the occurrence of high-severity fire in some circumstances. However, the relationship between forest density/fuel, mechanical fuel treatment, and fire severity is complex. For instance, thinning without subsequent prescribed fire has little effect on fire severity (see Kalies and Yocum Kent 2016) and, in some cases, can increase fire severity (Raymond and Peterson 2005, Ager et al. 2007, Wimberly et al. 2009) and tree mortality (see, e.g., Stephens and Moghaddas 2005, Stephens 2009: Figure 6)—the effects depend on the improbable co-occurrence of reduced fuels (generally a short time line, within a decade or so) and wildfire activity (Rhodes and Baker 2008) and can be over-ridden by extreme fire weather (Bessie and Johnson 1995, Hély et al. 2001, Schoennagel et al. 2004, Lydersen et al. 2014). Empirical data from actual fires also indicate that postfire logging can increase fire severity in reburns (Thompson et al. 2007), despite removal of woody biomass (tree trunks) described by land managers as forest fuels (Peterson et al. 2015). While our study did not specifically test for these effects, such active forest management practices are common on GAP3 and GAP4 lands. Recognizing these limitations, researchers have stressed the need for managers to strive for coexistence with fire by prioritizing fuel reduction nearest homes and allowing more fires to occur unimpeded in the backcountry (Moritz 2014, DellaSala et al. 2015, Dunn and Bailey 2016, Moritz and Knowles 2016).

Follow-up research at finer scales is needed to determine management emphasis and history in relation to fire severity. However, we believe our findings are robust at the subcontinental and ecoregional scales.

Conclusions

In general, our findings—that forests with the highest levels of protection from logging tend to burn least severely—suggest a need for managers and policymakers to rethink current forest and fire management direction, particularly proposals that seek to weaken forest protections or suspend environmental laws ostensibly to facilitate a more extensive and industrial forest–fire management regime. Such approaches would likely achieve the opposite of their intended consequences and would degrade complex early seral forests (DellaSala et al. 2015). We suggest that the results of our study counsel in favor of increased protection for federal forestlands without the concern that this may lead to more severe fires.

Allowing wildfires to burn under safe conditions is an effective restoration tool for achieving landscape heterogeneity and biodiversity conservation objectives in regions where high levels of biodiversity are associated with mixed-intensity fires (i.e., "pyrodiversity begets biodiversity," see DellaSala and Hanson 2015*b*). Managers concerned about fires can close and decommission roads that contribute to human-caused fire ignitions and treat fire-prone tree plantations where fires have been shown to burn uncharacteristically severe (Odion et al. 2004). Prioritizing fuel treatments to flammable vegetation adjacent to homes along with specific measures that reduce fire risks to home structures are precautionary steps for allowing more fires to proceed safely in the backcountry (Moritz 2014, DellaSala et al. 2015, Moritz and Knowles 2016).

Managing for wildfire benefits as we suggest is also consistent with recent national forest policies such as 2012 National Forest Management Act planning rule that emphasizes maintaining and restoring ecological integrity across the national forest system and because complex early forests can only be produced by natural disturbance events not mimicked by mechanical fuel reduction or clear-cut logging (Swanson et al. 2011, DellaSala et al. 2014). Thus, managers

wishing to maintain biodiversity in fire-adapted forests should appropriately weigh the benefits of wildfires against the ecological costs of mechanical fuel reduction and fire suppression (Ingalsbee and Raja 2015) and should consider expansion of protected forest areas as a means of maintaining natural ecosystem processes like wildland fire.

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Supporting Information

Additional Supporting Information may be found online at: http://onlinelibrary.wiley.com/doi/10.1002/ecs2.1492/full

ATTACHMENT M

United States Department of Agriculture
Forest Service

Flathead National Forest

Site Map

Flathead National Forest

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- News & Events

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(406) 758-3537 (fax)

Glacier View Ranger District
Hungry Horse Ranger District
Spotted Bear Ranger District (winter)
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Hungry Horse, MT 59919
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(406) 387-3889 (fax)

Spotted Bear Ranger District (Summer)
Spotted Bear, MT
(406) 387-3800 (winter)
(406) 758-5376 (summer)
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Proposed Summer 2021 Recreation Events and Guiding Services

The Forest will update this webpage with additional information about the status of each permit as it is reviewed by specialists and any permits are issued. **For questions or to comment on a project, please email the project lead.**

Single-Year Permits

Based upon preliminary analysis, the Flathead National Forest anticipates these projects fall within the Forest Service category of actions under 36 CFR 220.8 that may be excluded in either an environmental assessment (EA) or an environmental impact statement (EIS) and that no extraordinary circumstances exist which would preclude use of this category. Scoping comments along with additional review will determine whether these projects can be categorically excluded. These projects are specifically consistent with category 36 CFR 220.6(d)(8): *Approval, modification, or continuation of minor, short-term (1 year or less) special uses of National Forest System lands.*

Project Name	Project Description	Permit Status
Adventure Cycling Association Guided Bike Tours	Project Lead: **Sadie Wehunt** Project maps: **Tally Lake/Glacier View Ranger District Map** | **Swan Lake Ranger District Map** ACA is proposing 10 guided bike tours across the Flathead National Forest between June 21 and August 12, 2021. The routes occur on Tally Lake, Glacier View and Swan Lake Ranger Districts. Two tours are proposed with 42 participants over 2 days with no overnight camping on Flathead National Forest. Eight tours are proposed with 10-14 participants. Those tours vary from 1-5 days on Flathead National Forest, and 4 tours include overnight camping at Holland Lake, Big Creek, and Tuchuck developed campgrounds.	Application accepted
Bike Adventures Bike Tour	Project Lead: **Sadie Wehunt** Project Maps: **Tally Lake/Glacier View Ranger District Map** | **Swan Lake Ranger District Map** Bike Adventures is proposing one guided tour across the Flathead National Forest August 17-22, 2021. The route crosses Glacier View, Tally Lake, and Swan Like Ranger Districts. The number of participants projected is 25-30. The tour would overnight at Holland Lake developed campground on August 21.	Application accepted
Glacier Ridge Runners Livery Services and Guided UTV Tours	Project Lead: **Anthony Butterfield** Project Maps: **North Map** | **South Map** Glacier Ridge Runners is requesting 200 day-use service days to provide watercraft livery services to the Hungry Horse Reservoir and guide UTV tours on selected open-motorized NFS Roads on the Hungry Horse Ranger District. Requested livery services include pontoon boats, kayaks, and stand-up paddleboards rentals and delivery to Doris Point Boat Launch. Requested UTV tour routes include the west side of Hungry Horse Reservoir (NFSR 895), Aurora Basin (NFSR 895H), Desert Mtn. area (NFSR 497, 497A, 546), the east side of Hungry Horse Reservoir (NFSR 38) and the Meadow Creek Gorge/Trailhead(NFSR 2826). UTV use would only be allowed on weekdays as requested. The requested season of use for all activities is 5/1-10/31, 2021 and subject to seasonal road closures.	Application accepted

Swan Lake Ranger District
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Contact Us

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Project Name	Project Description	Permit Status
Montana Academy Guided Hikes	Project Lead: **Anthony Butterfield** Project Maps: **East Map** | **West Map** Montana Academy is proposing to take their students on day-use hiking trips on various trails on the FNF from 5/1-10/31, 2021. Estimated maximum group sizes is 10 students and 2 staff members. Montana Academy will use a large van to carpool to trailhead and trips will likely occur 1 day on either Saturday or Sunday. **Swan Lake Ranger District** Strawberry Lake **Hungry Horse Glacier View RD** Columbia Mtn Demers Ridge Moose Peak Standard Peak Firefighter Lookout Tr(Road) **Tally Lake RD** Lupine lake Danny on Tally Lake Overlook Tally Mountain Trail Tally Gorge Trail	Application accepted
Pancake Ride Bike Event	Project Lead: **Anthony Butterfield** Project Map: **Pancake Ride Project Map** The proponent is requesting to host the Joe Cosley Pancake Ride, a day-use, self-supported cycling event on FNF open motorized roads on 7/10/2021. The event is expected to have approximately 50 participants and the maximum participants would be capped at 75. The event starts and ends on private land in Trego, MT. The FNF land/roads requested are Red Meadow Road (NFSR 115) and Trail Creek Road (NFSR 114).	Application accepted
Spotted Dog Cycles Guided Bike Tour	Project Lead: **Anthony Butterfield** Project Map: **Spotted Dog Cycles Project Map** Spotted Dog Cycles is proposing to guide a self-supported bike tour on the FNF 6/28-7/1/20. Guided group would consist of 10 riders and 2 guides. FNF lands/roads requested include Trail Creek Road (NFSR 114), Hay Creek Road (NFSR 376, NFSR 1685, Red Meadow Road (NFSR 114) and Red Meadow Lake Campground. Overnight use on NFS land would occur 6/30 at the Red Meadow Lake Campground. Other overnight use would occur on private lands or on the Kootenai NF.	Application accepted
Snowbike Nation e-Bike, e-Dirt Bike, Motor Bike Tours	Project Lead: **Darlene Bridges** Project maps: **Crane Mountain-Six Mile Zone Map** | **Skyland Zone Map** | **Swan Range Zone Map** | **West Side Tally Lake Zone Map** | **Whitefish Range Zone Map** | **Wild Bill-Blacktail Zone Map** Snowbike Nation has proposed guided e-bike, e-dirt bike, and dirt bike trips on the Hungry Horse, Glacier View, Tally Lake, and Swan Lake Ranger Districts. The tours would include 1-6 clients, and 200 service days are requested. The activity would occur May 1st – the summer season or a seasonal closure date as indicated on the Motor Vehicle Use Map (MVUM). Proposed roads to access trailheads are via open motorized routes via motorized vehicle as indicated on the MVUM. Proposed trails and roads to be used by e-bikes, e-dirt bikes and dirt bikes are routes currently authorized on the MVUM as open to motorized use.	Application accepted
Narrow Path Adventure Watercraft Livery Services	Project Lead: **Darlene Bridges** Project map: None. Narrow Path Adventure is proposing livery service for delivery of motorized equipment including boats and wave runners to the Swan Lake Boat Launch for clients who have pre-rented equipment from the shop in Ferndale. 1-2 delivery per day and equivalent pick-ups. Use of the boat launch and parking lot would be for short term loading and unloading only. 200 service days have been requested. If permitted, the holder would be required to purchase use of the boat launch through the concessionaire just as the public does.	Application accepted

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Project Name	Project Description	Permit Status
Flathead Biking Cycling Race	Project Lead: **Beth Pargman** Project Map: **Flathead Biking Race Map** Flathead Cycling is proposing a bike race/ride on May 22 with a maximum of 75 participants. The route is partially located on the Swan Lake Ranger District. The race would begin at Herron Park and proceed southwest along Foy's Canyon Road and turn south on Patrick Creek Road (NF-2991) to Emmons saddle and intersection with Foy's to Blacktail Trail. Racers would then proceed north to Herron Park via the Foy's to Blacktail Trail to complete the clockwise loop/s. The racecourse would only cross Forest Service Land during the midsection of the course, so most of the spectators and race support would remain at Herron Park.	Application accepted
Last Best Ride - Recreation Event	Project Lead: **Tad Wehunt** Project Map: **Last Best Ride Map** The Last Best Ride, is a one-day gravel bicycle race/ride, on Sunday August 22nd, 2021, partially on the Tally Lake and Hungry Horse/Glacier View Ranger Districts. It is designed to showcase the amazing gravel roads Whitefish's surrounding areas have to offer. The event will start and finish in Depot Park in downtown Whitefish. Spectating will take place at Depot Park or on WMR only. Set up for the race would occur on August 21st, and the course will be swept at the end of race day and final signage clean up would continue the day after the race, on August 23rd. The proposed event has two routes, varying in length to accommodate how much riders wish to challenge themselves. Two aid stations will be located off of the national forest and 2 will be located on national forest lands; on at the Summit House at the Whitefish Mountain resort and one at the junction of NF Road 1658(Werner Peak Rd) and the Werner Peak Lookout road. Trained volunteers will be scattered throughout the course for rider safety, both directing riders and helping to keep speeds safe. Maximum number of participants will be 550. See attached map for route details. Race coordination has occurred with FNF, City of Whitefish, F.H. Stoltze Land and Lumber, WMR, MT DNRC, and private land entities.	Application accepted
Whitefish Shuttle	Project Lead: **Tad Wehunt** Project Maps: **Glacier View Map** | **Glacier View Bike Routes Map** | **Hungry Horse Map** | **Tally Lake Hiking Routes Map** | **Tally Lake Livery Map** Whitefish Shuttle is requesting shuttle services (livery), guided van tours, guided mountain biking and/or hiking trips on the Tally Lake and Hungry Horse / Glacier View system roads and trails from June 1 to October 31st. Requested shuttle routes and locations include Roads: 115, 315, 316, 317, 376, 542, 909, 913, 2916, 2932, 2934, 2942, 5207, 11203 (plus ~18 miles of County Road crossing USFS lands). One touring route is requested from Polebridge up to Red Meadow Pass and down the Upper Whitefish Road, with a pullover at Red Meadow Lake for a stretch and picture break. No food service will be provided. Requested hiking only trails: Tally Lake RD – Stryker Mtn, #27, Finger Lake #802, and Lagoni Lake, #811. Hungry Horse/Glacier View trails – Cyclone LO #40, Glacier View Mtn #266, and Doris Ridge #52. There are three biking/ebiking routes requested, all on open gravel roads. 1) Cyclone Notch Loop, 2) Moose Lake Out and Back, 3) Red Meadow Loop. See map for details. Shuttle capacity is 14 clients. Maximum group size would be 14 clients and one guide. Requested number of service days is 200.	Application accepted
Alpine Running Guides	Project Lead: **Tad Wehunt** Project Maps: **Danny On Trail Map** | **Reid Divide Map** Alpine Running Guides proposes to offer guided running trips to trail runners, as shown in the table and map below. They anticipate 10-14 participants on each trip with 1-2 guides. Trails would include the Danny On (#370) and the Reid Divide Trail (#800). Clients will receive transportation to and from the trailhead from Whitefish, snacks, and lunch, plus access to water filters, maps of the route, local knowledge/interpretation, and the ability to borrow bear spray. Guides would have trash bags and carry out any trash from clients as well as any trash found along the trail. They would only drive on roads open to motor vehicles. Note that USFS does not authorize activities on roads that are not under USFS jurisdiction, such as County roads. They are requesting 100 service days.	Application accepted

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Project Name	Project Description	Permit Status
KRMC Journey to Wellness Forest Walks	Project Lead: **Tad Wehunt** Project Maps: **Swan Lake Ranger District Hikes Map** | **Tally Lake Ranger District Hikes Map** KRMC has requested 200 service days on the Tally Lake and Swan Lake Ranger Districts for guided day hikes under the Journey to Wellness program with The Summit Health Club. The routes proposed for the hikes include 811 Lagoni Lake, 804 Tally Lake Overlook, Round Meadow trail system and Blacktail cross country trail system. The hikes would occur between July 1 and September 30. Group size would range from 10-20 with an additional 2-4 guides present.	Application accepted
Action Rentals Guided ATV/UTV	Project Lead: **Tad Wehunt** Project Map: **Action Guide Rentals Map** Action Rentals has proposed guided ATV/UTV tours on the Tally Lake Ranger District of the Flathead National Forest between June 1st and November 30th, 2021. Routes would include FSR #910, Martin Cr. Road, to access Sunday Falls, FSR #2872, Martin Lake Road, FSR #9620, the West side of Martin Creek and a small portion of the Old Fort Steele Road which is under Country jurisdiction. Maximum group size will not exceed 15 and/or 6 vehicles per trip. Action Rentals is requesting 200 temporary service days. Action Rentals has a current permit with DNRC on adjacent lands.	Application accepted
Whitefish Bike Retreat	Project Lead: **Tad Wehunt** Project Maps: **Whitefish Bike Retreat Map** Whitefish Bike Retreat is requesting to provide shuttle services (livery) on the Tally Lake system roads and trails. Drop off locations for livery services would occur at the intersection of Reid Divide, Bill Creek and Ashley Mountains. NFST 800, 801, 294, 310 and NFSR 313, 538, 542, 913, 2912, 2912B, 2942, 5263, 9601, 9763, 9784, 11258 (plus < 1mile of County Road crossing USFS lands) would be utilized. Shuttle capacity is 12 clients. Group size would be 1-12 clients. Shuttle services would run from May 1st through October 31st. Requesting 200 service days.	Application accepted
Kiwanis Fun Ride Recreation Event	Project Lead: **Tad Wehunt** Project Map: **Kiwanis Fun Ride Map** One day fun (7/24/2021) motorcycle ride on system roads and trails to support the Kiwanis Club of Kalispell. Participants are anticipated to be 30 with a max of 40. Two routes are proposed. For street legal bikes the loop route would be from Bitterroot Lake to NFSR 538, to 9784B, 313, 2908, 9887, 538B and back to the 538 and down out of the forest. Non legal street bikes would be trailered to the second route and park at the Lupine Lake Trailhead NFST 210 and utilized a down and back route on NFST 210, 310, 289 and 171.	Application accepted
Northwest Montana Adventures	Project Lead: **Tad Wehunt** Project Maps: **Red Meadow Lake Area Map** | **Taylor Creek Area Map** Northwest Montana Adventures is requesting 200 service days to provide guided ATV/UTV tours on the Tally Lake and Glacier View Ranger Districts. The proposed dates of operation are June 1st through October 31st with the restrictions of normal road closures for Side by Sides or UTVs. The tours would be permitted in conjunction with the Stillwater State Forest. The applicant is currently permitted on DNRC lands adjacent to the requested area. Proposed routes include Taylor Creek NFSR 9790 road to Big Mountain summit house, to Warner Peak NFSR 1658 on the divide, and to Red Meadow Lake NFSR 115 only from the Tally Lake RD side.	Application accepted

Multi-Year Permits

Based upon preliminary analysis, the Flathead National Forest anticipates these projects fall within the Forest Service category of actions under 36 CFR 220.8 that may be excluded in either an environmental assessment (EA) or an environmental impact statement (EIS) and that no extraordinary circumstances exist which would preclude use of this category. Scoping comments along with additional review will determine whether these projects can be categorically excluded. These projects are specifically consistent with category 36 CFR 220.6(d)(8): *Approval, modification, or continuation of minor, short-term (1 year or less) special uses of National Forest System lands.*

Project Name	Project Description	Permit Status

ATTACHMENT M

Project Name	Project Description	Permit Status
Whitefish Legacy Partners Ultramarathon Recreation Event	Project Lead: **Tad Wehunt** Project Map: **WLP Ultramarathon Map** Whitefish Legacy Partners (WLP), in partnership with the City of Whitefish and the Whitefish Chamber of Commerce, is hosting an ultra-marathon on October 2, 2021. Runners will start in Depot Park in downtown Whitefish at 7:00am. The 50-kilometer course will leave the Park, cross over the viaduct via the Wisconsin Ave bike path, connect to Colorado Ave. and the City of Whitefish Bike/Ped path along Wisconsin, turn right on Reservoir Rd, and connect to the Whitefish Trail in Haskill. Runners will then connect to WMR trails (Summit Trail and Kashmir) to the summit of Big Mountain. Runners will descend the Flower Point Trail to the Danny On Trail, to WMR trails and connect back to the Whitefish Trail in Haskill. The finish line will be at Oktoberfest in Depot Park. The course will be well marked with temporary flagging and signs. The course markings, aid stations, and signs will be set up on October 1st and taken down after the race on October 3rd. A maximum of 400 participants is being requested and 300 spectators and volunteers. Impact to public trail users will be negligible as runners will be spread out over the 50k course. This event has been a reoccurring use and would be authorized under a 5-year permit with the operating plan updated annually.	Application accepted
Foy's to Blacktail Marathon	Project Lead: **Beth Pargman** Project Map: **Foy's to Blacktail Race Map** FTBT is proposing a 1-day foot race in September, for up to a maximum of 100 participants. The trail course is approximately 13 miles on USFS lands, starting at the Lakeside to Blacktail Trailhead on NFS Trail 104 to NFS Trail 185; then south on NFS Trail 185 to the trails, ski runs, and roads within the Blacktail Mountain Ski Area permit boundary; then back on NFS Trail 185 north to the Forest boundary. This event has been a reoccurring use and would be authorized under a 5-year permit with the operating plan updated annually.	Application accepted

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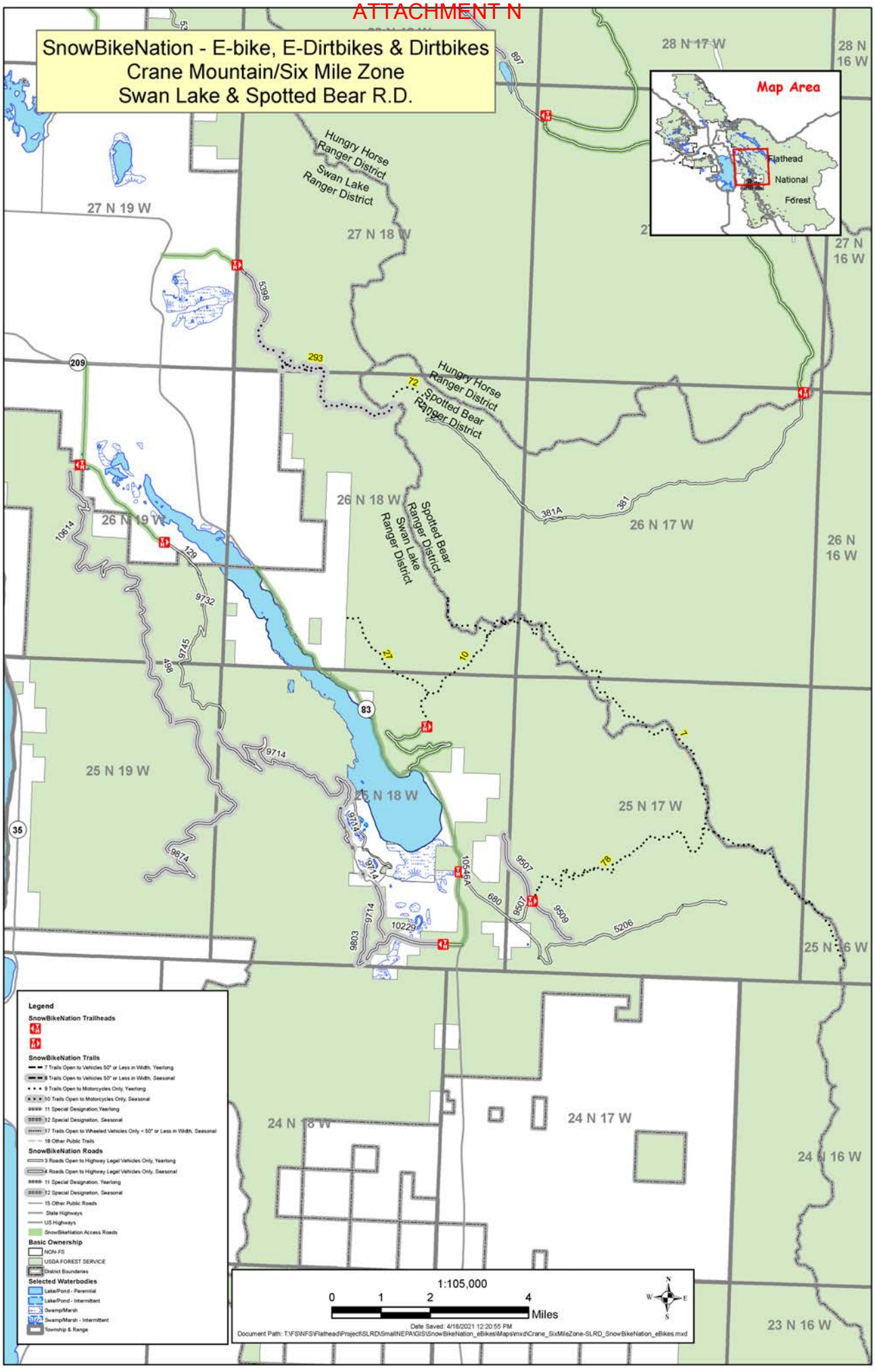
ATTACHMENT N



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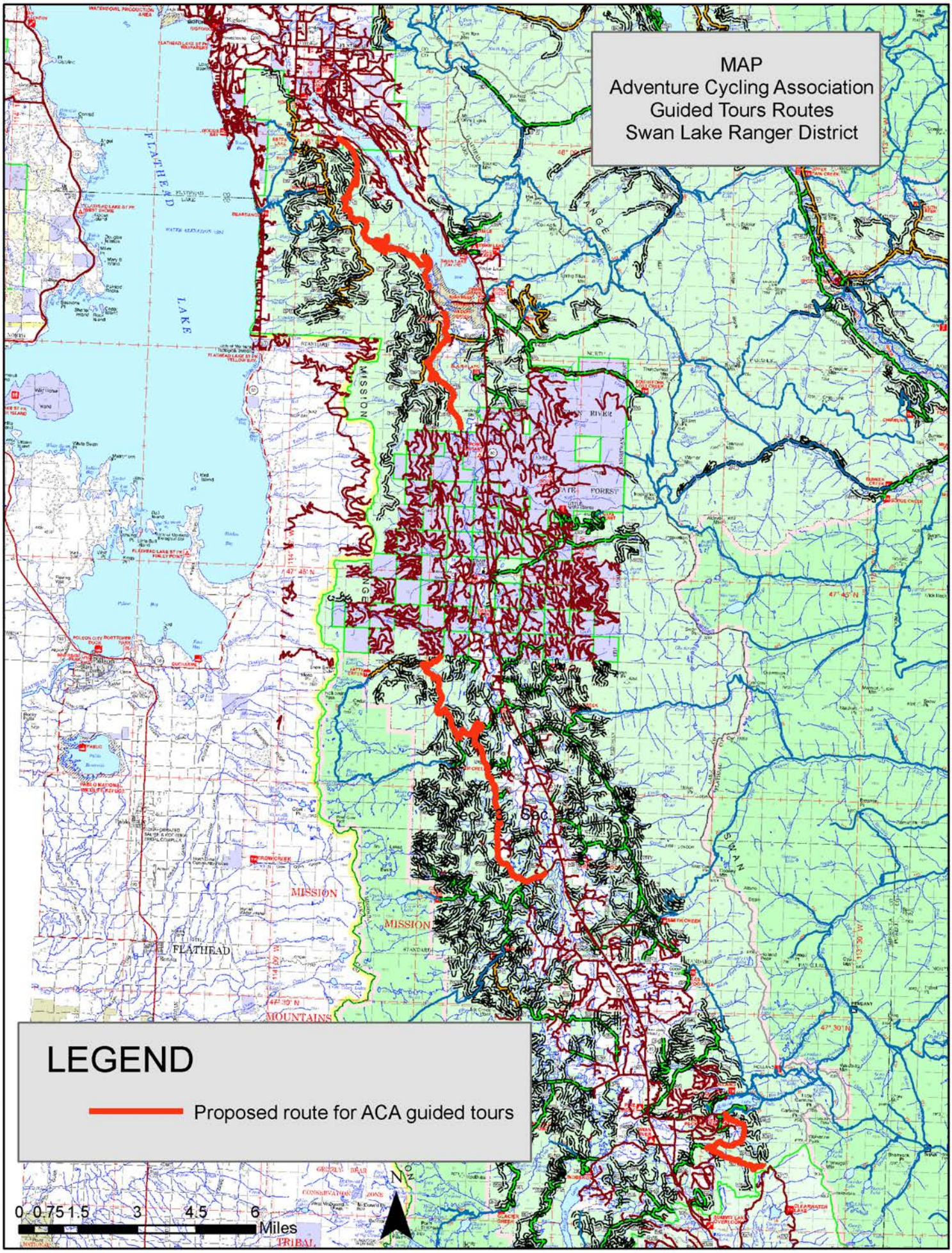

ATTACHMENT P