

USDA Forest Service  
Helena-Lewis and Clark National Forest  
Forestwide Prescribed Fire Project #63783

### Comments on the Forestwide Prescribed Fire Project #63783

I present these comments to the proposed Forestwide Prescribed Fire Project. As I understand the project it entails a proposed plan to use prescribed fire to deal with undergrowth and improve both the health and the fire resistance of the forest and will be used within Region One and if successful then adopted by other Regions of the USFS.

My wife and I live within the urban interface above Helena, about 5 miles up Grizzly Gulch, where Prospector Gulch turns to go to the Helena Ridge Trail. Thus we are affected by any Forest Service program, especially any prescribed burn. The air here is often smoke filled at the time of the year when the Forest Service does one of its prescribed burns. I know that the Forest Service has to use fire as a way to burn slash cut to reduce the undergrowth of vegetation which can be a fuel source should a fire start. Fire has become a more prevalent issue as our climate changes and the combination of higher heat and drought affect our lives, especially impacting the forests which surround us. Thus while I wish there were different ways to address the undergrowth issue, reality tells me that there are no other viable options.

However our concern is more of how the process is carried out in the field rather than an objection to the use of fire in prescribed burns.

We live immediately adjacent to a segment of the national forest and this also adjoins our property to the west and north. In 2018 or 2019, the Forest Service did an underbrush clearing on national forest land between our house and the neighbor's. There was a crew which worked clearing the landscape and stacking the slash for later burning. Because the boundary between our land and the the forest is not clear, we met with the Forest Service Assistant Ranger who was leading the crew.

After establishing where the boundary was we then discussed some items which we saw as a problem. There were several. Throughout the project, the crew stacked cut underbrush and small trees immediately adjacent and under other larger trees. We noted that when those slash piles would be burned they would also burn the larger trees. Also for the most part, ladder fuel was not cut from the large trees next to the slash piles.

The USFS employee assured us that we were correct in our observations. He explained that the work crew varied and all did not come to work at the same time, meaning that perhaps some of the workers did not understand the procedure of where to place the slash piles. He said that he could do nothing about the location of the slash but when it was time to burn them, the crew could move the slash from under mature trees to slash piles further away. Had we thought about this representation we would have realized that moving the slash piles later was an impossibility. Those piles would be and were burned in early 2020 or 2021, when they were snow covered. So, what we were told was something to placate us and get us out of the way. While he agreed with our observations about the ladder fuel, he never implemented any instructions to remove those fuels.

We were away from home when the burn on the property adjacent to ours occurred. As you expect, no slash piles were moved and some trees close to those piles were burned, damaged or killed. So now we have standing dead timber near the older trees which were to be maintained in a healthy forest.

This fall, the forest service apparently contracted with a company to cut the undergrowth to the west and north of our property. There were no Forest Service employees monitoring the project that we saw. The result was the same as before. Slash piles were placed under or close to large mature living trees. Some slash piles were put on top of downed trees, virtually assuring that when the piles were burned, the dead tree would also be consumed, burning adjacent trees. Ladder fuel was left in place. Since there was no Forest Service employee present or in charge, we and others simply called the District Rangers office to register our concern. We never received a response. .

However about a week or so after the contractors left the area, I came across a young man, out in the area, surveying the work the contractors had done. We talked. He had come from Missoula, was part of the Region One office and was checking to assure that the contracted work had been completed. I walked him through a part of the area, pointing out the problems. He concurred these were likely problems. Slash piles under or close to mature trees. Ladder fuel left on mature trees, in some instances almost touching slash piles, assuring that when the piles were burned, those trees would be damaged or destroyed. The USFS employee agreed with the observations, these were not appropriate practices and the forest would be damaged when the piles were burned. But he could do nothing, it was not his job. He would provide comments about the issue in his report.

I know that this relates to other past projects and does not speak to the proposed prescribed fire project. It does, however, speak to the issue of how the work is likely to be done. This proposed project is to further the health of the forest, specially to protect and preserve the large mature trees in the forest, clearing undergrowth which can threaten those trees and the forest and those who live in or near the forest, those within the urban interface. If this is the goal then there has to be some concern over how the work is actually carried out in the field.

During the past several years to present, the work is actually counterproductive to the goal sought to be achieved. When slash piles are put close to or under the trees the work seeks to protect, it assures damage and destruction to the very trees the Forest Service is trying to save. When ladder fuel is left on older mature trees, it almost guarantees that should fire occur, those trees will fall victim to the fire, especially those trees whose ladder fuel touches or is very close to the slash piles which will be set on fire a few seasons from now.

Here are a few proposals to improve the situation and to help USFS achieve it's goal of supporting and maintaining older mature trees and protecting those who live within the urban interface:

1. Contracts should be written to require that slash piles are placed a minimum number of feet from mature trees. It seems that perhaps this should be 10 feet or so. Ladder fuel on mature trees should be trimmed, again to a prescribed height, perhaps 6 feet above ground
2. Before the contract is closed, someone from the Forest Service should inspect the work and if there are slash piles too close to the trees, if the ladder fuel is not eliminated, the contractor should be compelled to move the piles before being paid for the work.
3. When the work is being done by Forest Service crews, the same set of requirements for slash piles and ladder fuels should be followed and once the work is done, it should be inspected and corrected if not done appropriately.

4. For existing projects, where slash piles are under or close to trees, those piles in this category should not be burned. Some remediation should also occur to reduce or eliminate the ladder fuels in those areas about to be exposed to a prescribed burn.

As I understand the prescribed fire project, if these modifications are made the established goals of improving forest health and protecting those living within the urban interface can be achieved. It may take a bit more care and time and some additional money to accomplish this. But without modifying the manner in which the work is being done, the Forest Service will never achieve its goals in a satisfactory manner while at the same time, frustrating many citizens who observe the work and wonder why did the Forest Service allow this poor work to damage the very trees they are trying to preserve.

Thank you

Ronald Waterman  
4974 Prospector Gulch Rd.  
Helena, Montana 59601  
[ronwaterman530@gmail.com](mailto:ronwaterman530@gmail.com)  
406-461-0662