The Connections Between

The Proposed Action, The Preliminary Need to Change, The Revised Assessment, and

Appendix 3 of the Proposed Action and the Implications for

Alternatives to the Proposed Action

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The Proposed Action builds on several important predecessor documents including the Preliminary Need for Change, and the Revised Assessment. It is necessary to review how well the Proposed Action incorporated the findings of these other efforts.

One of the salient findings of the Revised Assessment is the significant drift of the current forest conditions away from the natural range of variability. This is particularly apparent in the warm-dry forest type and the warm-moist forest type. The significance of this divergence remains difficult for the public to appreciate because the Proposed Action lists only Desired Conditions on many variables without referencing current conditions. That the Forest considered including both sets of information in the Proposed Action tables is tantalizing hinted in Proposed Action Table 1 which is mistakenly titled. “Existing and Desired Conditions for Conifer Forest Dominance…”; yet the table only provides desired conditions. Providing both sets of data would be very helpful for the public and future practitioners as a benchmark for progress. It is unlikely that future practitioners are going to search out the Revised Assessment to do their own comparisons. Likewise having both existing and desired condition data on a variety of variables would bolster the arguments in the Preliminary Need for Change**.**

The review provided by Proposed Action Appendix 3 (Proposed and Possible Actions and Potential Management Approaches) also provides a basis for a need to pursue more aggressive action if the Forest is going to make significant progress in restoring ecosystem integrity to the landscape. The LRC assumes that the review provided in Appendix 3 of the Proposed Action was crafted after the main text of the Proposed Action was prepared. Thus the findings presented in Appendix 3 should affect the modification of the Proposed Action or development of alternatives to the Proposed Action.

The suggestions in Appendix 3 for more mechanical treatment of various types prior to burning are well documented as much more effective at moderating eventual wildfire than burning alone or thinning alone. Scroll down to the last photo in the article linked below. A telling landscape photo shows the after-wildfire effects of various treatments on The Nature Conservancy land in Oregon.

<https://blog.nature.org/2022/03/14/wildfire-resilience-treatments-work/>

As shown in this last photo, the difference in fire behavior on lands that were not treated, lands that were thinned only, and lands that were thinned and then treated with prescribed fire is stark. Although this is a single incident, research by the Forest Service Fire Lab confirms the value of combined thinning and burning. Mark Finney of the Missoula Fire Lab can provide well tested advice. His work demonstrates that prescribed fire alone and thinning alone are not nearly as effective as the combination.

I have seen fuels mitigation work completed and targets counted with little apparent remediation of fuel conditions that would affect fire behavior. Forest monitoring efforts must absolutely account for and assess effectiveness of these treatments.

Appendix 3 makes a strong case for the need for landscape scale treatments beyond the scale of much of what the Forest has generally attempted in the past. This need and the current condition of much of the Lolo National Forest argue for the consideration of a more aggressive “Managed Restoration Emphasis Alternative”. I include the word “managed” because there is a constituency that argues that the only thing we need to do is get out of the forest, wrap up the roads, and let nature heal itself. We will leave that perspective for the Forest to argue and not repeat the counterarguments here.

Under a Managed Restoration Emphasis Alternative, the Forest would design a program to address the scale of work needed on the Lolo National Forest if we are to respond to the ecological needs implied in the Revised Assessment, the Preliminary Purpose and Need, and Appendix 3 of the Proposed Action. Pages 4 and 5 of Appendix 3 cast some doubt on whether Agency management can accomplish enough to affect the change needed. Notwithstanding this skepticism I ask the Forest to design an alternative to take us as far as possible down the road of ecological restoration.

I realize that budgets to do this scale of work are not entirely forthcoming. However, the public (and Congress) need to know what is required at this point. This information will be particularly salient as you begin the process of identifying alternatives to the Proposed Action and comparing the effects of these alternatives. This comparison is, of course, particularly challenging in the face of climate change, increasing human populations, and demands for Forest services and products.

The Preliminary Need for Change also outlines scores of needs, yet it is not clear how many of these are translated into the Proposed Action. One example is noted. On page 17 (4.3.6 Designated Areas), the Preliminary Purpose and Need identifies “(a need for—) plan content for recommended wilderness that reflects the influence of management activities conducted by American Indians prior to westward expansion.”

Two questions follow:

1. Why is this need only identified for MA-2, (Recommended Wilderness)? Is it not also appropriate for MA-3 and MA-4, if not MA-1 and MA-5 also?
2. Why is this need to learn from aboriginal activities not reflected in Proposed Action plan components identified for MA-2 (and the other MA’s)?

The general public and the agency would benefit from a crosscheck that identifies where the needs identified in a Final Need for Change document are addressed in the Proposed Action plan components. This index could look like a version of the Readers Guide (Appendix 11) and would cross reference the Forest identified needs and the relevant plan components. Preparing such an index could reveal the unmet needs in the Proposed Action and prompt the revisions of the Proposed Action or development of alternatives.

In summary an ambitious course of action must be identified for the Forest in this revised Forest Plan. I also concede that your task is made more difficult because the data base to support this work is only partially complete. However, Forest Inventory and Analysis data and the Region 1 Vegetative Mapping data (VMap) and the general scientific literature are better than we have ever had. And so you must continue the Agency efforts that analyzed the status of Upper Columbia River Basin ecosystems (including the Lolo NF) and enshrined the findings in the Interior Columbia Basin Ecosystem Management Project (known by those consumed by its preparation as “ice bump”). Even though much of this work has been modified, it still provides a strong philosophical underpinning for an ecosystem management approach the Forest is undertaking. Carry on.