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Organization:

Title:

Comments: Comments on Mid-Swan Landscape Restoration and Wildland Urban Interface Project--Copy and science included **copy with science**

Dear Forest Service,

The Forest Service's first responsibility is to protect the wild character of the Mission Mountains Wilderness. The proposal violates the fundamental values of Wilderness and should be rejected. It is also completely unsupported by science, and for that reason, I can only assume this is a pretext for logging. Bradley et al. (2016) found that areas more protected has less of the severe wildfire. The areas that had more? Those were the areas where the vegetation had manipulated.

* Prescribed fire would interfere with natural processes in the Mission Mountains Wilderness. Not only would it interfere with natural processes in a statutorily designated area where we have codified that nature will govern, but prescribed fire often happens outside of actual fire season, in the spring or fall, and is not as intense as some wildfires need to be. There is a place for high-severity wildfire in nature. See Hutto (2008), Hanson (2010), and DellaSala (2018) (these have literature reviews with the science you need to consider)

* Your own researcher, Cohen, found that that home loss is directly influenced by home ignitability. Cohen (1999/2000) Ignitable homes can be lost in low-severity wildfire, while firewise homes can survive high severity wildfire. So, based on the above, not only what you propose violates the Wilderness Act, but it is also not based on the best science. To fear monger that houses will be lost unless the Forest Service can authorize logging is misleading and drives action that will cause people to falsely place their hope in this project (perhaps at the expense of not making their homes inflammable). That could kill people.

* Planting white bark pine would significantly manipulate the wild character of the Mission Mountains Wilderness. Logging eliminates what might have otherwise been fire refugia, which adds to manipulating nature. See Meddens et al. (2018); Krawchuck et al. (2016). When the Wilderness Act was passed, some of the ideas behind an area unmanipulated by man was to have a comparison by which you could judge what you did manipulate. That is how Bradley et al. 2016 was able to generate this science. You start messing with the areas that are supposed to be control, then it is going to be near impossible to measure the impacts of your strategies.

* Helicopter use is incompatible with Wilderness, harasses wildlife, and destroys the experience for Wilderness visitors.

Please scrap your plans to manipulate the Mission Mountains Wilderness by burning and planting white bark pine on thousands of acres. Instead, let the Wilderness be wild as the Wilderness Act requires. I have tried to access plan documents and information, but your website won't pull them up.

ATTACHMENTS:

Bradley et al 2016_does increased forest protection correspond.pdf

Hanson_2010_myth_of_catastrophic_wildfire.pdf

Cohen 2000.pdf

DellaSala et al. 2018_Everything you wanted to know about wildland fires in forests.pdf

Hutto 2008 Eco importance of severe wf-bb woodpecker.pdf

Krawchuk et al. 2016_Topographic and fire weather controls of fire refugia.pdf

Meddens et al 2018 Fire refugia what are they and why do they matter.pdf