From:	Norman Bishop		
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Thank you for the opportunity to comment, as I did on the DEIS August 15, 2018.

As I read the FEIS, I am reminded of the cautionary advice given to medical students: First, do no harm. I see extensive roading, massive deforestation, and various vegetation treatments with no scientific justification for them. As a frequent user of forest trails, I am dismayed at the scope of the destruction laid out in this plan.

As a graduate student at Colorado State University, my major was Forest Recreation. In recent decades, I have become a student of climate change. Numerous studies document that forests are far more valuable to us as carbon sinks if they are undisturbed.

As a park ranger in Yellowstone, I participated in the restoration of wolves there, which has had a profound effect on the park's biodiversity. Even after fires, biodiversity is greater if there is no post-fire logging.

In a GEOS Institute Open Letter to Decision Makers Concerning Wildfires in the West, 217 scientists from all over the United States wrote, "As scientists with backgrounds in ecological sciences and natural resources management, we are greatly concerned about proposals to speed up and expand logging on public lands in response to recent increases in wildfires in the West." On thinning, "Thinning large trees, including overstory trees in a stand, can increase the rate of fire spread by opening up the forest to increased wind velocity, damage soils, introduce invasive species that increase flammable understory vegetation, and impact wildlife habitat." And, "Post-disturbance Salvage Logging Reduces Forest Resilience and Can Raise Fire Hazards - Commonly practiced after natural disturbances (such as fire or beetle activity), post-disturbance clearcut logging hinders forest resilience by compacting soils, killing natural regeneration of conifer seedlings and shrubs associated with forest renewal, increases fine fuels from slash left on the ground that aids the spread of fire, removes the most fire-resistant large live and dead trees, and degrades fish and wildlife habitat. Roads, even 'temporary ones,' trigger widespread water quality problems from sediment loading. Forests that have received this type of active management typically burn more severely in forest fires." And, "Though it may seem to laypersons that a post-fire landscape is a catastrophe, numerous studies tell us that even in the patches where fires burn most intensely, the resulting wildlife habitats are among the most biologically diverse in the West. For these reasons, we urge you to reject misplaced logging proposals that will damage our environment, hinder climate mitigation goals and will fail to protect communities from wildfire." Their letter is attached.

Norman A. Bishop



Open Letter to Decision Makers Concerning Wildfires in the West

As scientists with backgrounds in ecological sciences and natural resources management, we are greatly concerned about proposals to speed up and expand logging on public lands in response to recent increases in wildfires in the West – proposals such as the House version of the 2018 Farm Bill. There are pragmatic, science-based solutions that can maintain biologically diverse fire-dependent ecosystems while reducing risks to communities and firefighters facing some of the most active fire seasons in recent memory. Unfortunately, such solutions are getting lost in the endless rhetoric and blaming that has characterized wildfires in the media, Congress, and the Trump administration. We the undersigned are calling on decision makers to facilitate a civil dialogue and careful consideration of the science to ensure that any policy changes will result in communities being protected while safeguarding essential ecosystem processes.

Why Is the West Burning and Is This Unnatural?

Wildfires have shaped the ecology of western ecosystems for millennia, whether lit by lightning or managed by American Indian tribes for cultural benefits. Wildfires vary in intensity and occurrence, across regions and vegetation types, elevation and climatic gradients, so there is no one-size-fits all strategy. The West has always burned and will always burn, and it needs to in order to maintain ecosystems and the myriad services they provide to the public in the form of carbon sequestration, clean water, abundant wildlife, and outdoor amenities. Attempting to suppress fires that are not a risk to communities is impractical, costly, risky to firefighters, and ecologically damaging. Also, forests are not the majority of the area burned annually on average in the United States; grasslands and shrublands are a large component of area burned annually that is unaffected by any forest management.

What is different today about wildfires is they are now burning over larger landscapes (more acres) since the 1980s, although overall fewer acres are burning today compared to that estimated in early decades and historical timelines.¹ Wildfire season in the West recently has lengthened from an average of five to seven months, and the number of large wildfires (>1,000 acres) has increased from 140 to 250 per year.² This is occurring as average annual temperature in the West has risen by nearly 2 degrees Fahrenheit since 1970s and winter snow pack has declined.³ Increases in acres burning can now be attributed, in part, to climate change⁴ and the

³Union of Concerned Scientists (UCS). 2017. Western wildfires and climate change.

 $http://www.ucsusa.org/global_warming/science_and_impacts/impacts/infographicwildfires-climate-change.html \end{tabular}. WcBXE5OGNTb$

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¹Littell, J.S. et al. 2009. Climate and wildfire area burned in western U.S. ecoprovinces, 1916-2003. Ecol. Applic. 19:1003-1021. Egan, T. 2009. The Big Burn. Mariner Books: Boston, NY. Parks, S.A. et al. 2015. Wildland fire deficit and surplus in the western United States, 1984-2012. Ecosphere 6:1-13.

²Dennison, P. et al. 2014. Large wildfire trends in the western United States, 1984-2011. Geophysics Research Letters 41:2928-2933.

⁴Abatzoglou, J.T., and A.P. Williams. 2017. Impact of anthropogenic climate change on wildfire across western US forests. PNAS 113:11770-11775.

increase is expected to continue in many areas with additional warming, leading to even greater suppression costs and loss of life.⁵

In addition to climate change, more than 80 percent of fires nationwide have been caused by people,⁶ and millions of homes are now in harm's way,⁷ resulting in skyrocketing costs. Putting more money into fire suppression will not reduce homeowner losses as long as homes continue to be built next to fire-adapted ecosystems, lack defensible space⁸ and/or fire-proofing, and measures are not taken to reduce human-caused wildfire ignitions.⁶

What Is Active Management and Does It Work to Reduce Fire Activity?

Active management has many forms and needs to be clearly defined in order to understand whether it is effective at influencing fire behavior. Management can either increase or decrease flammable vegetation, is effective or ineffective in dampening fire effects depending on many factors, especially fire weather, and has significant limitations and substantial ecological tradeoffs.

Thinning Is Ineffective in Extreme Fire Weather – Thinning is most often proposed to reduce fire risk and lower fire intensity. When fire weather is not extreme,⁹ thinning-from-below of small diameter trees followed by prescribed fire, and in some cases prescribed fire alone,¹⁰ can reduce fire severity in certain forest types for a limited period of time¹¹. However, as the climate changes, most of our fires will occur during extreme fire-weather (high winds and temperatures, low humidity, low vegetation moisture). These fires, like the ones burning in the West this summer, will affect large landscapes, regardless of thinning, and, in some cases, burn hundreds or thousands of acres in just a few days.¹² Thinning large trees, including overstory trees in a stand, can increase the rate of fire spread by opening up the forest to increased wind velocity, damage soils, introduce invasive species that increase flammable understory vegetation, and impact wildlife habitat.⁹ Thinning also requires an extensive and expensive roads network that degrades water quality by altering hydrological functions, including chronic sediment loads.

Post-disturbance Salvage Logging Reduces Forest Resilience and Can Raise Fire Hazards – Commonly practiced after natural disturbances (such as fire or beetle activity), post-disturbance clearcut logging hinders forest resilience by compacting soils, killing natural regeneration of

⁹Moritz, M.A., et al. 2014. Learning to coexist with wildfire. Nature 515: 58-66. Schoennagel, T., et al. 2017. Ibid.

¹⁰ Zachmann, L.J. et al. 2018. Prescribed fire and natural recovery produce similar long-term patterns of

change in forest structure in the Lake Tahoe basin, California. For. Ecol. and Manage. 409:276-287

¹¹Stone, C. et al. 2003. Forest harvest can increase subsequent forest fire severity.

⁵Schoennagel, T., et al. 2017. Adapt to more wildfire in western North American forests as climate changes. PNAS 114:4582-4590.

⁶Balch, J.K., et al. 2016. Human-started wildfires expand the fire niche across the United States. PNAS 114: 2946-2951. ⁷Syphard, A.D., et al. 2013. Land use planning and wildfire: development policies influence future probability of housing loss. PLoS ONE 8(8):71708. Strader, S.M. 2017. Spatiotemporal changes in conterminous US wildfire exposure from 1940 to 2010. Nat. Hazards https://doi.org/10.1007/s11069-018-3217-z.

⁸Cohen, J.D. 2000. Preventing disaster: home ignitability in the wildland-urban interface. J. of Forestry 98: 15-21.

 $https://www.fs.fed.us/psw/publications/documents/psw_gtr208en/psw_gtr208en_525-534_stone.pdf$

Brown, R.T., et al. 2004. Forest restoration and fire: principles in the context of place. Cons. Biol. 18:903-912. Kalies, E.I., and L.L.Y. Kent. 2016. Tamm Review: Are fuel treatments effective at achieving ecological and social objectives? A systematic review. For. Ecol. and Manage. 375:84-95. Goodwin, M.J. et al. 2018. The 15-year post-treatment response of a mixed-conifer understory plant community to thinning and burning treatments. <u>https://doi.org/10.1016/j.foreco.2018.07.058</u>¹²Stephens, S.L., et al. 2015. Large wildfires in forests: what can be done? Action Bioscience April 15

conifer seedlings and shrubs associated with forest renewal, increases fine fuels from slash left on the ground that aids the spread of fire, removes the most fire-resistant large live and dead trees, and degrades fish and wildlife habitat.¹³ Roads, even "temporary ones," trigger widespread water quality problems from sediment loading. Forests that have received this type of active management typically burn more severely in forest fires.¹³

Wilderness and Other Protected Areas Are Not Especially Fire Prone – Proposals to remove environmental protections to increase logging for wildfire concerns are misinformed. For instance, scientists¹⁴ recently examined the severity of 1,500 forest fires affecting over 23 million acres during the past four decades in 11 western states. They found fires burned more severely in previously logged areas, while fires burned in natural fire mosaic patterns of low, moderate and high severity, in wilderness, parks, and roadless areas, thereby, maintaining resilient forests. Consequently, there is no legitimate reason for weakening environmental safeguards to curtail fires nor will such measures protect communities.

Closing Remarks and Need for Science-based Solutions

The recent increase in wildfire acres burning is due to a complex interplay involving humancaused climate change coupled with expansion of homes and roads into fire-adapted ecosystems and decades of industrial-scale logging practices. Policies should be examined that discourage continued residential growth in ecosystems that evolved with fire. The most effective way to protect existing homes is to ensure that they are as insusceptible to burning as possible (e.g., fire resistant building materials, spark arresting vents and rain-gutter guards) and to create defensible space within a 100-foot radius of a structure. Wildland fire policy should fund defensible space, home retrofitting measures and ensure ample personnel are available to discourage and prevent human-caused wildfire ignitions. Ultimately, in order to stabilize and ideally slow global temperature rise, which will increasingly affect how wildfires burn in the future, we also need a comprehensive response to climate change that is based on clean renewable energy and storing more carbon in ecosystems.

Public lands were established for the public good and include most of the nation's remaining examples of intact ecosystems that provide clean water for millions of Americans, essential wildlife habitat, recreation and economic benefits to rural communities, as well as sequestering vast quantities of carbon. When a fire burns down a home it is tragic; when fire burns in a forest it is natural and essential to the integrity of the ecosystem, while also providing the most cost-effective means of reducing fuels over large areas. Though it may seem to laypersons that a post-fire landscape is a catastrophe, numerous studies tell us that even in the patches where fires burn most intensely, the resulting wildlife habitats are among the most biologically diverse in the West.¹⁵ For these reasons, we urge you to reject misplaced logging proposals that will damage

¹³Lindenmayer, D.B., et al. 2008. Salvage logging and its ecological consequences. Island Press: Washington, D.C. Thompson, J.R., and T.A. Spies. 2009. Vegetation and weather explain variation in crown damage within a large mixed-severity wildfire. For. Ecol. Manage 258:1684-1694.

¹⁴Odion et al. 2004. Fire severity patterns and forest management in the Klamath National Forest, northwest California, USA. Cons. Biol. 18:927-936. Zald, H., and C. Dunn. 2018. Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape. Ecol. Applic. 4:1068-1080. Bradley, C.M., et al. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? Ecosphere 7:1-13.

¹⁵DellaSala, D.A., and C.T. Hanson. 2015. The ecological importance of mixed-severity fire: nature's phoenix. Elsevier: Boston http://www.sciencedirect.com/science/book/9780128027493 (Chapters 1 through 5, and 11).

our environment, hinder climate mitigation goals and will fail to protect communities from wildfire.

Sincerely (affiliations are listed for identification purposes only),

Paul Alaback, Ph.D. Professor Emeritus University of Montana Missoula, MT

John Alcock, Ph.D. Emeritus Regents Professor of Biology Tempe, AZ

Donald Alley, M.S. Fisheries Biologist D.W. Alley & Associates Brookdale, CA

Malek Al-Marayati, M.S. Pasadena, CA

Danielle Amoroso, M.S. Professor Los Angeles, CA

Jennifer Anderson, B.A. Retired Lecturer, Environmental Studies University of California Santa Cruz, CA

William Armbruster, Ph.D. Principal Research Scientist Institute of Arctic Biology, University of Alaska Fairbanks, AK

Richard Baker, Ph.D. Emeritus Prof., Earth and Env. Science University of Iowa Iowa City, IA

William Baker, Ph.D. Professor Emeritus University of Wyoming Laramie, WY Jesse Barber, Ph.D. Associate Professor Boise State University Boise, ID

Paul Beier, Ph.D. Professor of Conservation Biology School of Forestry, Northern Arizona Univ. Flagstaff, AZ

Craig Benkman, Ph.D. Professor University of Wyoming Laramie, WY

Linda Bernhardt, M.S. Former County Natural Resources Manager Talent, OR

Leslie Bishop, Ph.D. Professor Emerita of Biology Earlham College Nashville, IN

Scott Black, M.S. Executive Director Xerces Society Portland, OR

James Blauth, Ph.D. Professor of Biology University of Redlands Redlands, CA

David Blockstein, Ph.D. Senior Adviser Assoc. for Env. Studies and Sciences Takoma Park, MD

Katherine Bode, M.S. Senior Botanist Avila and Assoc. Consulting Engineers, Inc. Gerton, NC Monica Bond, M.S. Principal Scientist Wild Nature Institute Concord, NH

Jim Boone, Ph.D. Owner Desert Wildlife Consultants, LLC Las Vegas, NV

Brooke Boswell, M.S. Research Program Manager University of Northern British Columbia (UNBC) Seattle, WA

Curtis Bradley, M.S. Senior Scientist Center for Biological Diversity Tucson, AZ

Richard Bradley, Ph.D. Associate Professor, Emeritus The Ohio State University Columbus, OH

Dennis Bramble, Ph.D. Professor (Emeritus) University of Utah Escalante, UT

Chelsea Brisson, M.S. Student Northridge, CA

Barbara Brower, Ph.D. Professor Portland State University Portland, OR

Betsy Bultema, M.S. Nevada City, CA

Steven Buskirk, Ph.D. Professor Emeritus University of Wyoming Laramie, WY Ken Carloni, Ph.D. Science and Natural Resources Chair Umpqua Community College (Ret.) Roseburg, OR

Ron Carroll, Ph.D. Distinguished Fellow, River Basin Center University of Georgia Watkinsville, GA

Bobb Carson, Ph.D. Professor and Dean Emeritus Lehigh University Coopersburg, PA

Donna Cassidy-Hanley, Ph.D. Freeville, NY

F. Stuart Chapin, Ph.D. Forest Ecosystem Ecologist, Retired University of Alaska Fairbanks Fairbanks, AK

Eric Chivian, M.D. Founder and Former Director Harvard Medical School Boston, MA

Raymond Clarke, Ph.D. Professor Emeritus Sarah Lawrence College Bronxville, NY

Patrick Crist, Ph.D. Director of Conservation Planning Broomfield, CO

Sam Davis, Ph.D. Research Manager Dogwood Alliance Asheville, NC

Brittany Davis, Ph.D. Assistant Professor of Env. Science Allegheny College Meadville, PA

Dominick A. DellaSala, Ph.D. Chief Scientist Geos Institute Ashland, OR Alan Dickman, Ph.D. Professor Emeritus University of Oregon Eugene, OR

Andrew Dobson, Ph.D. Prof. of Ecology and Evol. Biology Princeton University Princeton, NJ

Craig Downer, Ph.D. Candidate Wildlife Ecologist Andean Tapir Fund Minden, NV

Tom Dudley, Ph.D. Research Scientist University of California Santa Barbara, CA

Christopher Dunn, Ph.D. Research Scientist Oregon State University Corvallis, OR

Vern Durkee, Ph.D. Retired Botanist Ithaca, NY

Richard E Edelmann, Ph.D. Director Miami University Oxford, OH

Robert Espinoza, Ph.D. Professor California State University, Northridge Northridge, CA

Gerald Estberg, Ph.D. Retired University of San Diego Port Angeles, WA

Jonathan Evans, Ph.D. Professor of Biology University of the South Sewanee, TN Daniel Feller, B.S. Western Region Ecologist Department of Natural Resources Swanton, MD

Doug Fischer, Ph.D. Research Scholar Ronin Institute Santa Barbara, CA

Daniel Fisher, Ph.D. Professor University of Michigan Ann Arbor, MI

Thomas Fleischner, Ph.D. Executive Director Natural History Institute Prescott, AZ

Eric Forsman, Ph.D. Research Wildlife Biologist, Retired Corvallis, OR

Michael Fox, DVM PhD, DSc Private consultant Minneapolis, MN

Janet Franklin, Ph.D. Distinguished Professor of Biogeography University of California - Riverside Riverside, CA

Douglas Frederick, Ph.D. Professor NCSU Raleigh, NC

Jerry Freilich, Ph.D. National Park Service Research Coordinator Olympic National Park (retired) Bend, OR

Lee Frelich, Ph.D. Director, Center for Forest Ecology University of Minnesota St. Paul, MN Christopher Frissell, Ph.D. Principle Research Scientist Frissell & Raven Hydrobiology & Landscape Sciences Polson, MT

Evan Frost, M.S. Terrestrial Ecologist Wildwood Consulting Ashland, OR

Stephen W Fuller, Ph.D. Professor Emeritus University of Mary Washington Fredericksburg, VA

Christine Perala Gardiner, Ph.D. Senior Advisor Deer Creek Association Cave Junction, OR

A. Gatz, Ph.D. Professor of Zoology Ohio Wesleyan University Delaware, OH

John Gerwin, M.S. Research Curator, Ornithology N. Carolina Museum of Natural Sciences Raleigh, NC

Alexandra Getches, B.S. Plant Biologist National Park Service Thousand Oaks, CA

Steven Green, Ph.D. Professor Emeritus University of Miami Coral Gables, FL

Gregory Grether, Ph.D. Professor University of California Los Angeles, CA

Ed Grumbine, Ph.D. Land and Conservation Director Grand Canyon Trust Flagstaff, AZ Chad T. Hanson, Ph.D. Research Ecologist Earth Island Institute Berkeley, CA

Richard Halsey, M.S. Director California Chaparral Institute Escondido, CA

Cheryl Harding, Ph.D. Professor Emeritus Hunter College New York, NY

Stacey Harmer, Ph.D. Professor University of California, Davis Davis, CA

Cindy Haws, M.S. Professor of Science Umpqua Community College Myrtle Creek, OR

Betsy Herbert, Ph.D. Freelance writer Sempervirends Fund Corvallis, OR

Fritz Hertel, Ph.D. Professor CSU Northridge Northridge, CA

Nancy Hoalst-Pullen, Ph.D. Acworth, GA

Ingrid Hogle, M.S. Ecologist and GIS expert Self-employed Oakland, CA

Karen Holl, Ph.D. Professor of Environmental Studies University of California, Santa Cruz Santa Cruz, CA Richard Holmes, Ph.D. Research Professor of Biology Dartmouth College Hanover, NH

Paula Hood, M.S. Co-Director Blue Mountains Biodiversity Project Portland, OR

Malcolm Hunter, Ph.D. Professor University of Maine Orono, ME

Richard Hutto, Ph.D. Professor Emeritus University of Montana Missoula, MT

Timothy Ingalsbee, Ph.D. Executive Director Firefighters United for Safety, Ethics, and Ecology Eugene, OR

Jerome Jackson, Ph.D. Professor Emeritus Florida Gulf Coast University Ft. Myers, FL

David Janos, Ph.D. Professor Emeritus University of Miami Corvallis, OR

Robert Jarvis, Ph.D. Professor emeritus Oregon State University Corvallis, OR

Mitchell Johns, Ph.D. Professor Emeritus Soil and Plant Scientist California State University Chico, CA

Jay Jones, Ph.D. Professor of Biology and Biochemistry University of La Verne La Verne, CA Alan Journet, Ph.D. Co-Facilitator Southern Oregon Climate Action Now Jacksonville, OR

Jacob Kann, Ph.D. Aquatic Ecologist Aquatic Ecosystem Sciences LLC Ashland, OR

David Karowe, Ph.D. Professor of Biological Sciences Western Michigan University Kalamazoo, MI

James Karr, Ph.D. Professor Emeritus University of Washington Seattle, WA

Sterling Keeley, Ph.D. Professor of Botany University of Hawaii Honolulu, HI

Ian Keene, Ph.D. Environmental Scientist Conf. Tribes of the Siletz Newport, OR

Duane. Keown, Ph.D. Professor Emeritus, Science Education University of Wyoming Laramie, WY

Ruth Ann Kern, Ph.D. Associate Professor California State University, Fresno Fresno, CA

Maya R. Khosla, M.S. Ecologist Ecological Studies Rohnert Park, CA

Kevin Kilpatrick, B.A. Electric Utility Consultant San Diego, CA Bruce Kirchoff, Ph.D. Professor of Biology Greensboro, NC

Marni Koopman, Ph.D. Climate Change Scientist Geos Institute Ashland, OR

Grace Kostel, M.S. Botanist Black Hills State University Aurora, NE

Fayette Krause, Ph.D. Retired Pt. Townsend, WA

John Lamperti, Ph.D. Professor of Mathematics, Emeritus Dartmouth College Hanover, NH

Russell Lande, Ph.D. Emeritus Professor Dept. of Biology, University of California San Diego, CA

Rick Landenberger, Ph.D. Science and Management Specialist, and Assistant Planner West Virginia Land Trust Morgantown, WV

Marc Lapin, Ph.D. Assistant Laboratory Professor Middlebury College Middlebury, VT

Beverly Law, Ph.D. Professor, Global Change Biology Oregon State University Corvallis, OR

Geoffrey Lawrence, M.S. University Lecturer N. Hennepen Community College Pittsford, NY Derek Lee, Ph.D. Principal Scientist Wild Nature Institute Concord, NH

Richard Lee, Ph.D. University Distinguished Professor Miami University Oxford, OH

Jason A. Lillegraven, Ph.D. Arts and Sciences Dist. Emeritus Prof. University of Wyoming Laramie, WY

Harvey Lillywhite, Ph.D. Professor of Biology University of Florida Gainesville, FL

Brian Linkhart, Ph.D. Professor of Biology Colorado College Colorado Springs, CO

Darryl Lloyd, M.S. Author, photographer Friends of Mount Adams Hood River, OR

Frank Logiudice, M.S. Associate Instructor, Biology University of Central Florida Orlando, FL

Travis Longcore, Ph.D. Assistant Professor University of Southern California Los Angeles, CA

Thomas Lovejoy, Ph.D. George Mason University Washington, DC

Loys Maingon, Ph.D. Research Director Strathcona Wilderness Institute Courtenay, British Columbia Julin Maloof, Ph.D. Professor of Plant Biology University of California, Davis Davis, CA

Janet Marsden, Ph.D. Ph.D. candidate Syracuse University Syracuse, NY

Travis Marsico, Ph.D. Associate Professor Arkansas State University Jonesboro, AR

John Marzluff, Ph.D. Professor University of Washington Seattle, WA

Chris Maser, M.S. Corvallis, OR

Kathleen McCarthy, M.S. Landscape Restoration Project Manager New York, NY

Carl McDaniel, Ph.D. Prof. of Biology Emeritus; Visiting Prof. Rensselaer and Oberlin College Oberlin, OH

Robert Meese, Ph.D. Staff Research Associate IV, retired University of California - Davis Davis, CA

Gary Meffe, Ph.D. Research Professor, Retired University of Florida Brandon, VT

Char Miller, Ph.D. Pomona College Claremont, CA

Wayne Minshall, Ph.D. Emeritus Professor of Ecology Idaho State University Inkom, ID Dillon Monroe, M.S. Student California State University, Northridge Northridge, CA

Max Moritz, Ph.D. Cooperative Extension Wildfire Specialist U.C. Division of Agriculture & Natural Resources Santa Barbara, CA

Josie Moss, B.S. Field Biologist Aptos, CA

Ellen Moyer, Ph.D. Principal Greenvironment, LLC Montgomery, MA

Rob Mrowka, M.S. Senior Scientist Center for Biological Diversity Franklinville, NY

Dennis D. Murphy, Ph.D. Research Professor Biology Department, University of Nevada Reno, NV

K. Greg Murray, Ph.D. T. Elliot Weier Prof. of Plant Sciences Hope College Holland, MI

Philip Myers, Ph.D. Professor, Emeritus University of Michigan Ann Arbor, MI

Richard Nawa, M.A. Staff Ecologist Klamath-Siskiyou Wildlands Center Ashland, OR

Charles R. Neal, B.S. Ecologist US Dept. of Interior (retired) Cody, WY Gerald Niemi, Ph.D. Professor Duluth, MN

Barry Noon, Ph.D. Professor of Wildlife Ecology Colorado State University Fort Collins, CO

Elliott Norse, Ph.D. Ancient Forests of the Pacific Northwest Redmond, WA

Reed Noss, Ph.D. President Florida Institute for Conservation Science Sarasota, FL

Philip Nyhus, Ph.D. Associate Prof. of Env. Studies Colby College Waterville, ME

Dennis Odion, Ph.D. Research Ecologist Earth Research Institute University of California Ashland, OR

David Olson, Ph.D. Conservation Biologist Conservation Earth Washington, DC

Michael Parker, Ph.D. Professor of Biology Southern Oregon University Ashland, OR

Simmi Patel, M.S. New York, NY

Gustav Paulay, Ph.D. Professor University of Florida Gainesville, FL

Dennis Paulson, Ph.D. Director Emeritus Slater Museum, Univ. of Puget Sound Tacoma, WA Stuart Pimm, Ph.D. Doris Duke Chair of Conservation Duke University Durham, NC

Gerald Post, DVM Medical Director The Veterinary Cancer Center Norwalk, CT

Thomas Power, Ph.D. Professor Emeritus University of Montana Missoula, MT

Jessica Pratt, Ph.D. Assistant Professor University of California - Irvine Irvine, CA

Riley Pratt, Ph.D. Environmental Scientist University of California, Irvine Irvine, CA

Cameron Pujdak, M.S. CSUN Northridge, CA Robert Pyle, Ph.D.

Independent Biologist Xerces Society Gray's River, WA

James Quinn, Ph.D. Professor Emeritus Rutgers University New Brunswick, NJ

John Ratti, Ph.D. Research Professor University of Idaho Moscow, ID

Peter Raven, Ph.D. President Emeritus Missouri Botanical Garden St. Louis, MO Ryan Rebozo, Ph.D. Director of Conservation Science Pinelands Preservation Alliance Southampton, NJ

Khale Century Reno, M.Ed. Executive Director Wyoming Wilderness Association Sheridan, WY

Fred Rhoades, Ph.D. Research Assoc. & Retired Bio. Instructor Western Washington University Bellingham, WA

Ann F. Rhoads, Ph.D. Retired Professor of Botany Morris Arboretum of the Univ. of Pennsylvania Philadelphia, PA

Amy Rossman, Ph.D. Research Leader (retired) Mycology Laboratory Beltsville, MD

Matthew Rubino, M.S. Research Associate North Carolina State University Raleigh, NC

Will Russell, Ph.D. Professor San Jose State University San Jose, CO

Scott Russell, Ph.D. Professor University of Oklahoma Norman, OK

Robin Salter, Ph.D. Professor Emeritus Oberlin College Oberlin, OH

Paul Schaeffer, Ph.D. Associate Professor Miami University Oxford, OH Charles Schelz, M.S. Ecologist Cascade-Siskiyou NM Ashland, OR

Paula Schiffman, Ph.D. Professor of Biology California State University, Northridge Los Angeles, CA

David Schindler, Ph.D. Killam Memorial Prof.of Ecology Emeritus University of Alberta Edmonton, Alberta

Fiona Schmiegelow, Ph.D. Professor University of Alberta / Yukon College Whitehorse, Yukon

Karl Schneider, M.S. Retired Alaska Dept. of Fish and Game Alaska Dept. of Fish and Game (ret.) Homer, AK

Tania Schoennagel, Ph.D. University of Colorado Boulder, CO

Kathy Schwager, M.S. Ecologist Yaphank, NY

Mark Shapley, Ph.D. Research Paleolimnologist Idaho State University Helena, MT

Janet Shellman Sherman, Ph.D. Research Scientist, Lecturer Cornell University, Retired Gold Beach, OR

Stevem Singer, M.S. Forest Biologist Self-employed Santa Cruz, CA Thomas Sisk, Ph.D. Olajos-Goslow Chair of Env. Science Northern Arizona University Flagstaff, AZ

Diana Six, Ph.D. Professor of Forest Entomology and Pathology Franke College of Forestry and Conservation Missoula, MT

Candan Soykan, Ph.D. San Francisco, CA

Timothy Spira, Ph.D. Emeritus Professor, Biological Sciences Clemson University Clemson, SC

Trygve Steen, Ph.D. Forest Ecology Professor Portland State University Portland, OR

Alan Stemler, Ph.D. Professor Emeritus University of California - Davis Davis, CA

Richard Strathmann, Ph.D. Professor Emeritus Friday Harbor, WA

James Strittholt, Ph.D. President and Executive Director Conservation Biology Institute Corvallis, OR

Susan Swensen, Ph.D. Professor Ithaca, NY

Michael Swift, Ph.D. Assistant Professor Emeritus of Biology St. Olaf Colege Northfield, MN

John Terborgh, Ph.D. Professor Emeritus Duke University, University of Florida Gainesville, FL Stephen Tettelbach, Ph.D. Professor of Biology Long Island University Brookville, NY

Chant Thomas, M.S. Director Dakubetede Env. Education Programs Jacksonville, OR

Pepper Trail, Ph.D. Ornithologist Ashland, OR

Vicki Tripoli, Ph.D. Environmental Scientist Moorpark, CA

Walter Tschinkel, Ph.D. Professor Emeritus Florida State University Tallahassee, FL

Mary Tyler, Ph.D. Professor of Zoology University of Maine Orono, ME

Rick Van de Poll, Ph.D. Principal Ecosystem Management Consultants Center Sandwich, NH

Mike Vandeman, Ph.D. San Ramon, CA

Thomas Veblen, Ph.D. Distinguished Professor University of Colorado Boulder Boulder, CO

John Vickery, M.S. Natural Areas Specialist Denver Natural Areas Denver, CO

Marlene Wagner, M.S. Ph.D. Candidate Simon Fraser University Petersburg, AK Robert Wagner, Ph.D. Senior Ecologist Quantitative Ecological Services, Inc. Castle Rock, CO

Greg Walker, Ph.D. Professor Emeritus University of California, Riverside Riverside, CA

Vicki Watson, Ph.D. Professor Emeritus University of Montana Missoula, MT

Frank Wegscheider, M.A. Wildlife Biologist CSUF Orange, CA

Judith Weis, Ph.D. Professor Emerita Rutgers University Newark, NJ

Jeffery Werner, Ph.D. Wildlife Ecologist Conservation North Prince George, British Columbia

David Whitacre, Ph.D. Biology and Statistics Instructor Treasure Valley Math and Science Center Boise, ID

William Whitten, Ph.D. Senior Biologist Florida Museum of Nat. History Gainesville, FL

Tyler Wilson, B.S. Teaching associate/contract Biologist Simi Valley, CA

Gary Wilson, M.A. Professor Moorpark College Moorpark, CA Shaye Wolf, Ph.D. Climate Science Director Center for Biological Diversity Oakland, CA

George M. Woodwell, Ph.D. Founder, Director Emeritus The Woods Hole Research Inst. Woods Hole, MA

George Wuerthner, Ph.D. Ecologist and author Wildlife: A Century of Failed Forest Policy Bend, OR