

Comment on Lake Tarleton proposed Logging Plan:

The Lake Tarleton EA failed to assess the potential for increased risk of fire and fire spread caused by logging, and thus also failed to assess the potential for environmental contamination by the fire retardant chemicals WMNF plans to give itself permission to use in WMNF.

Nationwide Aerial Application of Fire Retardant on National Forest System Land. EIS *UPDATED*	- Regulations, Directives, Orders	In Progress: NOI in Federal Register 08/08/2020 Est. DEIS NOA in Federal Register 02/2022	Expected:06/2022	07/2022	Laura Conway 406-802-4317 laura.conway@usda.gov
Description: Programmatic Supplemental EIS for the Nationwide Aerial Application of Fire Retardant on National Forest System Land. Web Link: http://www.fs.usda.gov/project/?project=60450					
Location: UNIT - All Districts-level Units. STATE - All States. COUNTY - All Counties. LEGAL - Not Applicable. The direction in the SEIS will apply to use of aeryly delivered fire retardant on all National Forest System land. .					

<http://www.fs.usda.gov/project/?project=60450>



‘...over the past few decades, the federal government built an industry designed to fight fire, not light it. Concentrated in the Pacific Northwest, these operations have infused government cash into towns and businesses damaged by the loss of timber jobs, and it has provided much-needed reinforcements during intense wildfire seasons when rural communities and forest homes are threatened.

Critics say it also created a special interest that lobbies Congress and federal agencies for policies and funding that support fire suppression, and that the government has escalated costs through inflated pricing and wasteful spending. As Congress and the Forest Service poured more money into firefighting while failing to rein in costs, they undercut their own plans to return forests to healthier, safer conditions...

In 1995, wildfire was about 16 percent of the Forest Service budget. A decade later, it took up more than half of it. That is not solely the product of natural disaster, drought or forest fuels. It was part of the plan...

“You have this agency whose *raison d’être* was logging the national forests. That rug was pulled out from under it. The Forest Service needed to find a new reason for being,” Stahl said.

Then in 2000, after a few intense wildfire seasons, Congress approved close to \$1 billion in new funds for the Forest Service and Interior Department to carry out a national fire plan.

Stahl recalled a conversation he had with former Forest Service chief Mike Dombeck during his last days in office back in 2001, who he said was most proud of finding the agency a new revenue stream in wildfire...

“The Forest Service’s firefighting costs will continue to go up so long as Congress is willing to pay the tab,” he wrote. “The Forest Service will continue to spend more fighting fires because the war on fire pays its bills.”

<https://www.opb.org/news/article/wildfire-forest-service-budget-suppression-portion/>

WMNF needs to reference this document:

“193 Million Acres: Toward a Healthier and More Resilient US Forest Service is a collection of essays that examine the challenges the US Forest Service faces and propose solutions that would address them. Contributors include numerous retired agency leaders, including two former chiefs, as well as long-time outside observers. The purpose of the book is not to criticize the agency, but to offer concrete proposals for how, ultimately, the agency’s operations might be made more efficient and effective and its land-management activities maintained, expanded, and improved. In short, the objective of 193 Million Acres is to find paths toward a healthier and more resilient US Forest Service.”

“Weather and climate—drought, high winds, heat waves with triple-digit temperatures—have exacerbated the Western wildfires. But there’s also another factor that researchers and activists are calling for policymakers to recognize: commercial logging. On September 9, the Bear fire entered into an enormous tract of previously logged national forest and private commercial timberlands. This,

coupled with the heat and the wind and the lack of rain, set the stage for its monstrous expansion. “Logging, it turns out, makes fires bigger, hotter, and move faster,” Hanson told me. “Almost all the major fires in forested ecosystems in California and Oregon are being intensified by logging.”

In 2015, when Hanson approached the service to warn that logging would lead exactly to the explosion of a fire like the Bear, the agency ignored him. The John Muir Project, a nonprofit Hanson co-founded in 1996, filed suit in federal court to stop the agency’s so-called “fuel-reduction” logging program in California’s national forests, but the judge in the case deferred to the Forest Service—and the program continued unabated...

Years of wildfire research, however, contradict the notion that logging helps suppress fire. As early as 2004, three researchers concluded in a [paper for the Forest Service’s own symposium](#) that “perhaps counter intuitively, heavy harvest can increase subsequent fire severity.” Chad Hanson was one of the lead authors of the most comprehensive study ever conducted on fire in the West, published in 2016 in the annals of the Ecological Society of America. Hanson and his colleagues found that wherever there is more logging with fewer environmental protections, there is higher fire intensity, as logging removes the mature, fire-resistant trees; reduces the shade of the forest canopy that otherwise keeps the floor cool and wet; opens the forest to more wind that drives fire; spreads flammable invasive grasses like cheatgrass; and leaves a combustible mosh of what’s called slash debris, piles of branches and treetops that act as kindling. The 2016 study—its findings reiterated and supported in a May 2020 letter from over [two hundred scientists](#) to Congress—elicited no response from the Forest Service.”

<https://newrepublic.com/article/159910/forest-service-making-wildfires-worse>

“The recent increase in wildfire acres burning is due to a complex interplay involving human-caused 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 unsusceptible 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.”

<https://wildfiretoday.com/2018/09/22/217-scientists-sign-letter-opposing-logging-as-a-response-to-wildfires/>

<https://grist.org/fix/forest-thinning-logging-makes-wildfires-worse/>

<https://oregonwild.org/about/press/more-logging-won%E2%80%99t-stop-wildfires>

<https://phys.org/news/2021-08-severe-rural-regional-towns.html>

<https://www.esa.org/blog/2021/08/18/logging-increases-risk-of-severe-fire/>

“The Healthy Forest Initiative promotes the idea of broadscale forest thinning and fuel treatments as an effective means for mitigating hazardous fuel conditions. This is based on the sensible assumption that treating forest fuels is more cost effective than suppressing forest fires on untreated lands. In addition, forest thinning is potentially profitable, or at least can recoup the cost of thinning, and may also produce safer conditions for those living in the wildland-urban interface zones.

However, as the Cooney Ridge fire suggests, timber harvesting does not always reduce the intensity or severity of subsequent fires. At Cooney Ridge, much of the extensively and homogeneously logged private lands burned with uniform high severity (Figs. 3-4, Table 1). Presumably, this is due to residual fuel, which had dried to very low fuel moisture.”

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

“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.”



OSU fire researcher Chris Dunn examines a several-hundred-year-old Douglas fir that stood at the entrance of Delta Campground on the McKenzie River. The tree was cut as a hazard tree after the Holiday Farm Fire.

Jes Burns / OPB

<https://www.opb.org/article/2020/10/31/logging-wildfire-forest-management/>

The fire issue is not just out west:

“In the eastern U.S., where wildfires burn far less land than in the West, fire’s century-long absence has upended ecosystems. Forests once dominated by fire-adapted trees like oaks, hickories, and pines have been taken over by species that support far less wildlife. And overcrowded trees growing in woods without regular fire have stifled understory biodiversity, while raising the risk of damaging blazes.

“It’s really hard to express the extent to which our natural areas have been drastically altered by taking away fire,” says Deborah Landau, an ecologist with The Nature Conservancy...”

<https://thefern.org/2022/04/the-return-of-good-fire-to-eastern-u-s-forests-and-grasslands/>

“The warming climate is raising the risk of major wildfires almost everywhere, including in normally wet New England. Forest managers in New Hampshire are alerting residents and stepping up prevention.

Wildfire season is getting longer and more extreme in the western U.S., but fire is not just a problem in the West. The warming climate raises the risk of major fire damage almost everywhere, including normally wet New England. As New Hampshire Public Radio's Annie Ropeik reports, now forest managers warn that it could happen here...

Another reason these foresters are nervous - this ecosystem is actually overdue for a fire. Periodic, small fires from lightning strikes or set by Indigenous people and later colonists used to happen here every 10 or 15 years. They helped clear out brush and limit worse damage from out-of-control blazes. Then in the late 1800s came huge fires from logging and railroad construction. The government cracked down on fire. Since then, there's been very little burning in these woods, but the fires that have cropped up have been harder to fight than they might have been in a more balanced ecosystem.”

<https://www.npr.org/2021/07/10/1014914937/the-warming-climate-is-sparking-wildfires-on-the-east-coast>

WMNF needs to incorporate: *The wildfire reader : a century of failed forest policy*, edited by George Wuerthner, Island Press, ©2006 into its logging plans.



Fire scarred red pine on Mt. Stanton, Bartlett. These trees burned in 1793, 1811, 1816, 1839, 1854, 1886, and 1903. Photo courtesy of Adele Fenwick.

“For her Doctoral dissertation Maria Adele Fenwick documented fire history back to the late 1700’s in these stands. This captured a fire record at the outset of colonial settlement, yet the age of some of the trees indicates that the fire-adapted natural communities were already present and healthy prior to the colonial settlers arrival.

WMNF Fire managers are interested in exploring how and where Indigenous People used fire to benefit their environments. Was fire used by the Abenaki to promote blueberry and huckleberry growth? Was it used to keep areas open for mineral/lithic material collection?...or were these stands maintained by fires that traveled from the river bottoms into the hills? The Abenaki frequently burned the river valleys to facilitate travel and hunting; later, colonial settlers burned to clear land for crops and pasture. Historic paintings and photos of the Saco river valley show a grassland/savannah ecosystem, often with evidence of fire in the paintings:”

<https://indigenousoh.com/2021/11/16/white-mountain-national-forest-and-indigenous-new-hampshire-collaborative-collective-explores-past-abenaki-fire-use-on-the-land/>

“Approximately 102 million gallons of long-term fire retardant (approximately 56,868 drops) were aerielly applied to National Forest System lands in the 2012 - 2019 period. The estimated total acreage that could be affected on average each year by application of aerial fire retardant has increased from a range of 2,358 to 4,715 ...to between 8,586 and 22,552 acres ...

Since implementation of the ROD began in 2012, there have been 459 reported intrusions of aerielly delivered retardant into avoidance areas (including waterways and their buffers), 248 of which were into waterways.

<http://www.fs.usda.gov/project/?project=60450>

<https://www.sfchronicle.com/bayarea/article/Hordes-of-fish-killed-in-Berkeley-by-firefighting-13743502.php#photo-17176980> 2019:

The scarcity of data on Eastern fires increases the necessity for the precautionary principle and, with climate change, the necessity for severely limited logging.

