

October 21, 2008

Ms. Kristin Yannone
BLM Lander Field Office
1335 Main Street
P.O. Box 589
Lander, WY 82520-0589

Re: Comments on vegetation treatment and logging issues for consideration in the Lander RMP revision.

Dear Kristin:

Please consider the following comments from the Wyoming Outdoor Council regarding vegetation treatment and logging issues that we would like for you to consider as the Lander Resource Management Plan (RMP) undergoes revision.

Thin in forest types where it will be effective

Management actions should be specific to the actual hazardous fuel threat for each vegetation type, as all are different in terms of fire return interval, response to fire, and type of fires that occur. A 'one size fits all' policy should not be applied. Clearly, in some areas, thinning may be appropriate, but the Bureau of Land Management (BLM) must make sure that the solution fits the need and is specific to the forest type. To that end, we would like to see the BLM develop maps that show forest types, interval since last fire, proposed treatment method and a discussion of the effectiveness of each treatment method being employed in that forest type.

Concentrate thinning activities where they will do the most good

We request that thinning activities concentrate on where past experience and research demonstrates they will do the most good. Research shows that thinning to protect structures is most effective adjacent to the structure. For example, Cohen et al.'s Structure Ignition Assessment Model (SIAM) indicates that intense flame fronts (e.g. crown fires) will not ignite wooden walls at distances greater than 40 meters (approx. 130 feet) away. If the BLM concentrates its thinning activities adjacent to structures and private lands, it will by default provide a needed buffer between its management activities and lands and these private lands.

Trees to be thinned

In areas that could be suitable for thinning, we request that activities focus on thinning understory trees and removal of brush and fine fuels. Even in thinned areas, it is important that

the BLM link treatments with a post-restoration prescribed fire program that removes surface fuels. We believe that where thinning is used, removal of smaller diameter material will most likely have a net remedial effect. Brush and small trees, along with fine dead fuels lying on top of the forest floor, constitute the most rapidly ignited component of dry forests.

In addition, removal of mature trees can increase fire intensity and severity. These trees provide “insurance” because they often survive surface fires and can speed post-fire recovery. Even if they are diseased, dying or dead, large old trees and snags are important to many wildlife species and ecosystem functions. We therefore request that when thinning is being considered that it be applied to portions of the forest structure where it will make the most ecological sense and where the public may realize the most benefits.

Insect and disease infestations

While some trees can and perhaps should be removed, we would also like the BLM also consider the benefits of dead snags for wildlife, as well as other ecological benefits related to soil holding and “nurse tree” characteristics. The RMP should explain how any projects will provide for adequate snag retention to ensure these benefits.

In order to help the public to understand the problem related to insect and disease issues, it is important that the BLM provide stand inventory maps which delineate distribution of forest types by age class and stand density. These maps, in conjunction with an identification of the location of current pockets of beetle mortality or other target insect and diseases would serve as critical data necessary to understand current and future insect populations and disease threats.

Sanitation/salvage of dead and dying trees

We ask that the BLM to pay careful attention to which trees it classifies as “dying,” since in the past we feel it has sometimes used a broader interpretation of “dying” trees than is warranted. Because drought is the main driver in insect outbreaks and older trees are the most fire-resistant component of the forest, it does not make sense to us to remove trees just because they are old and therefore potentially susceptible to bug kill if the drought persists. Older age class trees provide critical habitat components in the forest. We therefore ask the BLM to be specific about what it regards as “dying,” and that that definition not include trees which it may classify simply as vulnerable to disease, bugs or fire.

The Wyoming Outdoor Council supports and advocates for healthy forests. Old growth forests, the presence of threatened, endangered and sensitive species and healthy streams and fisheries are all indicators of healthy forests. It is clear that the presence of dead and dying trees is not an indication of unhealthy forests, unless the BLM is merely looking at this issue from a commodity production standpoint, which we feel is an unduly narrow view under BLM’s multiple use obligations.

We would like the BLM to develop an alternative that maximizes the overall ecological health of the planning area, measured by retention of habitat security and old growth trees and maintenance of habitat conditions that are most likely to benefit sensitive, threatened and endangered species, as well as water quality and roadless values.

Clearcutting

Due to the impact to forest resources, we strongly discourage the BLM from proposing clearcutting as a treatment method under the RMP. It has been documented that clearcutting negatively impacts soil, water quality, and wildlife habitat. Because of this we encourage the BLM to consider alternatives to clearcutting such as selective harvesting and group selection cuts.

Secure habitat, hiding cover, and thermal cover

Please assure the public that the current amount of secure wildlife habitat will be maintained. Please provide an analysis of the effects of the proposed or potential treatments on secure habitat, hiding cover, and thermal cover for wildlife.

Prescribed fire

We acknowledge that use of fire as a management tool can be controversial; however, we also understand that it is a valid way to reduce an actual fuels buildup problem, if one exists. If addressing fuels and insects is an issue in the planning area, then the best approach for reducing those problems may be through the use of prescribed fire in areas where human safety and structures are not compromised.

Fire break effectiveness

Please provide an assessment regarding the expected effectiveness of fire breaks in slowing or stopping a stand-replacing fire. This information should be specific to various forest types.

Addressing fine fuels

Because fine fuels are the major determinant in driving large fires, we ask that the BLM to pay special attention to fine fuels, brush, etc., in the development of vegetation treatment and forestry prescriptions pursuant to this RMP. We also ask for a full assessment related to the effectiveness of each of the potential management actions related to fuels reduction.

Seral stage analysis

Please provide information regarding forest seral stages within the analysis area. Please assure that adequate amounts of functional old growth stands will be safeguarded from treatment and that an appropriate range of seral stages is maintained.

Age class diversity in analysis area

Please provide a map outlining forest age class diversity by stand, as well as an evaluation of the effects of actions on each age class.

No new roads

Please assure that no new or temporary roads will be constructed in currently roadless areas and that any new roads in currently roaded areas are as temporary as possible and reclaimed as expeditiously as possible. Where possible management actions should be completed using the existing road network. We also encourage the BLM to consider minimum impact techniques such as the use of large-wheeled vehicles, helicopters or winter horse logging to minimize the need for road building within the planning area.

Threatened and endangered species and special status species

Please provide an analysis of the likely impacts of any forestry projects on threatened and endangered species and special status species, especially Canada lynx, other forest carnivores such as wolverine, and raptors that use forested habitats. Please insure that proper consultation with the U.S. Fish and Wildlife Service and coordination with the Wyoming Game and Fish Department is initiated and completed.

Cumulative impacts analysis

Please assess the cumulative impacts of any potential or proposed vegetation treatment or forestry projects on forest resources in conjunction with other past and present projects and projects in the reasonably foreseeable future.

Water quality and fisheries

Please ensure that best management practices are implemented, including appropriate setbacks from riparian areas, to prevent sedimentation and other impacts to fisheries and water quality.

Roadless and Wilderness Characteristics

We would ask that the BLM not propose or pursue mechanical treatments or road building in any roadless areas. We would like for the BLM to assure the public that the roadless and wilderness characteristics within the planning area are maintained throughout the lifetime of the plan. Please take account of areas slated for treatment that may be in close proximity to roadless areas so that the roadless and wildlife characteristics and values in those adjacent areas are retained.

Noxious weeds

We are concerned about the potential spread of noxious weeds in a post-treatment environment. Please provide a plan that will minimize introduction of noxious weeds into treated areas. In addition, most noxious weeds are introduced through human causes. Therefore, we specifically request a plan that will address human access issues, both motorized and non-motorized, that will minimize the spread of noxious weeds onto the vulnerable post-treatment landscape.

Travel management

We ask that the BLM develop a plan that recognizes the potential for illegal user created motorized routes to be created and that proposes mitigation to reduce these routes and minimizes their impacts. The BLM should decommission user created motorized routes as part of this plan.

Grazing

We ask that the BLM identify how it proposes to adjust domestic livestock stocking rates within forestry or vegetation treatment areas to minimize domestic livestock grazing effects on plant and tree regeneration.

Visuals

The scenic qualities of proposed or potential project areas should be fully considered and protected to the maximum extent possible. Please develop a plan to maintain the scenic qualities in areas proposed for forestry or vegetation treatments.

On behalf of the Wyoming Outdoor Council, we appreciate the opportunity to submit these comments to the BLM as it works toward revision of the Lander RMP.

Sincerely,

Bruce Pendery and Lisa McGee
Wyoming Outdoor Council