

California Native Plant Society

1722 J Street, Suite 17 Sacramento, CA 95814 Tel: 916 447 2677 Fax: 916 447 2727

August 12, 2002

Dale N. Bosworth
Chief
USDA Forest Service
P.O. Box 96090
Washington, D.C. 20090-6090

Dear Chief Bosworth:

The California Native Plant Society (CNPS) is an organization of more than 10,000 scientists, professionals and lay persons united by an interest in California plant species and communities. Our mission is to increase understanding and appreciation of California's native plants and to conserve them and their natural habitats through education, science, advocacy, horticulture and land stewardship. Our members make extensive use of National Forests in California and elsewhere for research, education, and recreation. CNPS works closely with the Forest Service and other agencies who rely on CNPS information and expertise regarding California flora.

CNPS is aware that misunderstanding has yet again arisen from the terrible wildfires that are occurring throughout the western United States this season. We are deeply saddened by the loss of life and property that these fires have caused. However, we are also disappointed by the poor policy conclusions that appear to be emerging from the fires. Some in the timber industry, some elected officials, and even some Forest Service staff claim that failure to log national forests is the primary cause of the severity of this fire season and that uncompromising opposition to logging by the environmental and scientific communities is the primary factor that has prevented logging, allowed fuels to build up and made national forests more flammable. These claims are false. Those who are making them should cease to do so.

These claims have of course been made in the past. They have consistently been abandoned because they are supported by neither science or history. It is unfortunate that time must once again be wasted in discussion of these absurd theories, particularly because they have only become increasingly groundless as research and advocacy on fire and forest management have progressed. The purpose of this letter is to clarify the position of CNPS regarding fire and fuels management on national forests.



Dedicated to the preservation of California native flora

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Like most in the scientific and conservation community, CNPS is neither in favor of or opposed to logging *per se*. Instead we advocate forest, fire and fuels management practices that

- minimize danger to lives and property
- create and maintain sustainable, productive forest ecosystems dominated by viable native species
- conserve rare and imperiled species through their natural ranges
- protect water quality and supply, soils and other forest ecosystem services and resources

Pursuant to these principles we have consistently supported forest management projects that reduce fuels and fire risk adjacent to populated areas. Near populated areas, we support mechanical removal of biomass, thinning of small trees and brush, installation of fuel breaks, safe use of prescribed burning and other methods to accomplish this goal. We, like others in California's scientific and conservation community, have repeatedly asked both the Pacific Southwest Region and individual National Forests to develop a fuels treatment prioritization based on threats to lives and property (e.g. CNPS letter to CalOwl FACA committee 8/6/97). In addition, fuels treatment should be prioritized based on quantitative, science based assessments of site specific fire hazard (fuel loading and fire risk) so that scarce staff and funding can be used where they will have the most effect.

CNPS advocates the restoration of fire, through careful use of prescribed and prescribed natural fire, to areas where fire suppression has disrupted normal fire regimes. The expanded use of ecologically appropriate prescribed fire and prescribed natural fire would accomplish dual goals: the improvement of forest health and the reduction of fuel loading and therefore fire hazard. Ecologically appropriate fire is a fire regime that attempts to replicate the season of burning, intensity of burning and the interval between burns that an area experienced before European settlement. A basic principle of ecosystem management and conservation biology is that because species and ecosystems evolved through exposure to pre-European environmental conditions, those are the conditions that are most likely to maintain long term species viability and ecosystem health (Egan and Howell, 2001; Hessburg et al., 1999; Manley et al., 1995). Agency and university fire ecologists also agree that restoration of normal fire regimes should be a high priority for land managers in these areas (DellaSala and Frost, 2001; Biswell, 1999; Weatherspoon, 1996; Weatherspoon, et. al., 1992; Thomas et al., 1993; Martin and Sapsis, 1991; Noss, 1991). In addition, modeling studies have predicted that prescribed burning may be the most effective fuels treatment method in reducing fire intensity and rate of spread (Van Wagtendonk, 1996).

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CNPS recognizes that prescribed fire can be unacceptably dangerous in areas adjacent to populated areas. In many such cases we also recognize that mechanical removal of fuels is the only safe method of fuels reduction. We also often support the mechanical removal of fuels prior to prescribed burning to reduce fire intensity and the risk of escape. However, non-fire treatments, such as mechanical fuels reduction, have never been shown adequately to mimic the ecological impacts of fire (Weatherspoon, 1996; Martin and Sapsis, 1991). These methods should therefore be used where protection of life and property prohibits use of fire.

Regarding the idea that "logging" reduces fire hazard and, by extension, that opposition to "logging" increases fire hazard, it is important to recognize that there are many types of forest management practices which are sometimes or always called "logging". Thinning of small understory trees, commercial logging of large trees, selective logging, clear cutting, logging of plantations, and logging in late seral forests and roadless areas may all be called "logging", but have very different effects on resources and on fire hazard (Graham et al., 1999). Timber harvest also has very different impacts on fire hazard depending on the age and health of the forest being logged. As noted above, CNPS is not opposed to "logging" in general, but we do oppose timber harvest where it is dangerous or ecologically harmful.

It is well established that logging and roadbuilding often increase both fuel loading and fire risk. For example, the Sierra Nevada Ecosystem Project (SNEP) Science Team (1996) concluded that "timber harvest... has increased fire severity more than any other recent human activity" in the Sierra Nevada. Timber harvest may increase fire hazard by drying of microclimate associated with canopy opening and with roads, by increases in fuel loading by generation of activity fuels, by increases in ignition sources associated with machinery and roads, by changes in species composition due to opening of stands, by the spread of highly flammable non native weeds, insects and disease, and by decreases in forest health associated with damage to soil and residual trees (DellaSala and Frost, 2001; Graham et al., 2001; Weatherspoon et al., 1992; SNEP Science Team, 1996). Indeed a recent literature review reported that some studies have found a positive correlation between the occurrence of past logging and present fire hazard in some forest types in the Interior Columbia Basin (DellaSala and Frost, 2001).

Logging and roadbuilding are particularly dangerous in unroaded late seral forests. Because of the moist microclimate, closed canopies, large tree sizes, high frequencies of fire-resistant species, unroaded late seral forests often are healthier and present lower fire hazard than their more intensively managed neighbors (Franklin and Fites-Kaufman, 1996; DellaSala and Frost, 2001; Agee, 1993). As of May, 2001, more than 300 scientists had signed a letter advocating protection of roadless areas greater than 1000 acres in size

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to protect them, and the products and services that flow from them, from ecological damage associated with logging and roads (Nation's Scientists Urge Bush Administration to Uphold Critical Forest Protection Rule. World Wildlife Fund Press Release, 5/1/2001). For these reasons, CNPS has opposed projects that disrupt or destroy intact, unroaded late seral forests, where fire danger to human life and property is slight. We recommend that new entries into uncut and unroaded areas be discouraged because of potential impacts to forest health and increases in fire hazard.

Finally, it is clear from both scientific studies and CNPS observations in California that fuel loading is less important than weather patterns in producing severe fire events such as we see in 2002 (Keeley and Fotheringham, 2001; Moritz, 1997; Bessie and Johnson, 1995). Therefore, in years of extreme fire weather, it is likely that large and severe wildland fires will occur irrespective of previous management. Given this reality, CNPS recommends land use policies that minimize the expansion of the urban-wildland interface in general and the spread of low density housing development into flammable wildlands in particular (Keeley and Fotheringham, 2001). High density communities which are vigilant in maintaining defensible perimeters reduce risks to lives and property.

In summary, decades of research and experience regarding forest management and fire hazard in western Forests have taught us that

1. "Logging" does not reduce fire hazard, on the contrary, it can often increase fire hazard through generation of activity fuels and through reductions of forest heath.
2. Reduction of fire hazard, through appropriate and safe combinations of mechanical removal of small diameter fuels and prescribed burning, should be the highest management priority where lives and property are at risk from fire, particularly in the urban wildland interface.
3. Restoration of fire to fire-adapted ecosystems should be the highest priority for wildland ecosystems where lives and property are not at risk and where fire suppression has altered normal fire regimes.
4. Roadless and late seral stands should be protected from logging and roading. The management priority in these areas should be protection from invasive non-native weeds, diseases and other organisms and restoration of normal disturbance regimes, particularly through the use of prescribed fire where necessary.
5. Weather, rather than fuel loading, is often the major controller of fire size and severity. Thus, the ongoing spread of low density housing into flammable wildlands both reduces the health and integrity of the ecosystems and increases the danger to lives and property from wildfire.

CNPS believes that these lessons can be applied and these goals can be

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achieved if the Forest Service and Congress accept the lessons of science and land management and structures policies and budgets accordingly.

CNPS has based all of our fire management advocacy on the principles discussed above. We have never opposed fuels treatment proposals that are consistent with these principles. We have opposed logging projects in environmentally sensitive areas, such as roadless areas and late seral forests, that are not designed to reduce fire hazard to lives and property, but to remove the largest and most profitable trees available on national forest lands. Such projects are usually ecologically unnecessary and generally do more harm than good, both by reducing forest health and increasing fire danger.

Our record on this issue is consistent with that of the vast majority of scientific and conservation groups. As a recent GAO study reported, only 1% of Forest Service hazardous fuel reduction projects nationwide had been appealed as of August, 2001. None had been litigated (U.S. General Accounting Office, 2001). CNPS never stands in the way of projects which promote public safety. We reserve our appeal and litigation efforts for projects which needlessly harm the environment.

We hope that this statement clarifies our position on forest and fire management and that the Forest Service will be careful to be accurate in its characterizations of the positions of scientific and environmental organizations, such as CNPS, in the future.

Sincerely,



Emily B. Roberson, Ph.D.
Senior Policy Analyst

cc. U.S. Senator Dianne Feinstein
U.S. Senator Barbara Boxer
Congressman George Miller, House Committee on Resources
United States House of Representatives Subcommittee on Forests and Forest Health
Congressman James V. Hansen, Chair, House Committee on Resources
Gray Davis, Governor, State of California
Jack Blackwell, Regional Forester, Pacific Southwest Region USDA
Forest Service
Andrea E. Tuttle, Director, California Department of Forestry and Fire Protection

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Mary D. Nichols, Secretary, California Resources Agency

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