

Casper RMP/EIS Comments

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Category: Fire Management

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Comment:

Fire - The Draft EIS addresses the need to reduce fire in the Wildland-Urban Interface (WUI). See DEIS at 3-32. We concur with the need to focus both fuel reduction and fire suppression efforts in the WUI, and further note that the WUI needs to be rigorously defined. The WUI should be defined as lands within 0.25 miles of existing structures. Current definition of WUI in the Casper RMP DEIS is insufficient as it does not comport with the best available science.

Forestry - In its DEIS, BLM notes that lodgepole pines forests are suffering from a lack of age-class diversity and are vulnerable to beetles, and states that this is a result of the need for fire and forest management to achieve ecological health. See DEIS at 3-38. This is an unsupported and unsupportable position, and has its foundation in ecological ignorance. First of all, lodgepole pine is a fire-dependent invader with a strong need for sunlight to achieve seedling establishment, which means that lodgepole pines have a natural tendency to form even-aged stands following a disturbance - thus, the lack of age class diversity is not a sign of an unhealthy forest but a natural byproduct of lodgepole pine's ecological requirements. Secondly, there is nothing particularly natural about introducing a human-caused disturbance, be it fire or logging, to recycle lodgepole pine stands. In fact, lodgepole pine stands naturally devolve after 275 years or so, and are typically overtaken by spruce-fir or other forest types (which coincidentally have a greater value for wildlife and forest plants, when compared to the biologically depauperate lodgepole stands that preceded them). BLM should re-examine the ecological underpinnings of the Draft EIS, so that counterproductive management activities (like logging declining lodgepole stands) will not be pursued based on a lack of understanding of forest ecology.

BLM provides a table of stream miles and acres according to Properly Functioning Condition criteria for rangeland health. See DEIS at 3-46. A map of these PFC distributions should also be provided to the public, without which it is difficult for the public to comment on which areas are in greatest need of attention.