From: Matt Kales
To: John Segar
Cc: Jeff Rupert
Subject: RE: FWS comments on BLM draft 2013 fire IM
Date: Wednesday, May 08, 2013 3:20:37 PM

Thanks, John; we appreciate the response. I'm happy to move these to BLM and supplement our comments but don't to create any turbulence for you. Let me know if there's any problem with me asking BLM to consider these part of FWS' comments on the IM. Thanks again.

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From: Segar, John [mailto:john_segar@fws.gov]
Sent: Wednesday, May 08, 2013 2:01 PM
To: Matt Kales
Cc: Jeff Rupert; Michael Thabault; Nicole Alt; Pat Deibert; Jesse DElia; Noreen Walsh; Theresa Rabot; Michael Fris
Subject: Re: FWS comments on BLM draft 2013 fire IM

Thanks Matt, We took a quick review and put together the following thoughts:

- Fuels - Focus limited time and funding on the highest priority treatments. The IM provided good guidance on prioritizing habitat, but should provide better guidance on how to factor treatment effectiveness (how effective a fuels treatment is at stopping fire spread under expected conditions) into priority setting. No one wants to spend limited time and funds on a fuels treatment that is rarely going to assist firefighters stop fire spread. It would also be helpful to address how treatments will be monitored to determine their effective and better inform the design of future efforts. Reference EBIPM "When does it pay to conduct Fire Management" paper (Taylor, Rollins, Kobayashi)
- Suppression - Consistent guidance on suppression should be given. I know this is tough, but the statement "When suppression resources are widely available, maximum efforts should be placed on limiting fire growth in these polygons" (pg 2, para 3) is somewhat at odds with the direction on indirect attack in the Background on pg 6. It almost sounds like direction to use whatever resources are available whether it is safe or cost-effective. I think everyone is striving for a balanced approach, and we should give managers and particularly firefighters to adjust the strategy and tactics to what is safe and effective given the conditions.

Give me a call if we can be of any assistance. As it happens, both Lou Ballard (Fire Ecology/Rehab, 208-387-5584) and Kim VanHemelryk (Hazardous Fuels Reduction, 208-387-5957) also have extensive experience with BLM in Idaho and are extremely knowledgeable about sage grouse issues and the latest fire related science. Please feel free to encourage your staff to give them a call if they have any questions.
John

On Wed, May 8, 2013 at 10:50 AM, Matt Kales <matt_kales@fws.gov> wrote:
Jeff, John:

In light of tomorrow's fire policy briefing w/the Secretary, and the potential interest in the fire-SG nexus, we wanted to give you heads up re: the comments we intend to provide BLM later this morning on their draft fire IM. We have flagged some general and specific issues and welcome your feedback and perspective on what we intend to submit to BLM. Please let me know ASAP if you have questions, thoughts or other feedback. We do need to get this to BLM HQ shortly, so I'd appreciate a quick response if you do have substantive comments on our comments.

(Pat, Jesse: I formalized your general comments, below; but left your specific comments embedded in the docs and unchanged. Please let me know if I didn't capture something accurately and/or you want to formalize the embedded comments.)

Thanks, all.

Matt

FWS Comments on BLM draft IM re: Sage-Grouse Conservation in Fire Operations and Fuels Managements

1. General Comments:

- We are concerned that the IM, as currently written, could cause some unnecessary habitat loss and fragmentation unless BLM identifies and applies some additional, more specific sideboards. While we support the use of fire break as a tool for wildland fire management we want to ensure that implementation of the IM doesn't inadvertently create situations where decisions to employ fuel breaks are not fully informed and governed by local conditions and/or biological factors.

- The above concern leads us to question whether an IM is the appropriate vehicle to treat this topic and instead BLM consider limiting the IM to indicate an overarching fuel break strategy should be included in the ongoing RMP revisions. This approach would help ensure the effects of implementing a fuel break strategy could be spatially expressed, quantified and analyzed prior to initiating new fire breaks in otherwise undisturbed habitat. A revised, limited IM could serve to emphasize that "immediate opportunities" to deploy fire breaks (i.e., in

advance RMP revisions/amendments) should be limited to existing linear rights of way and, in so doing, establish some more refined sideboards on what the IM does/not direct.

- The draft IM appears focused on fuel breaks (as opposed to suppression). Previous, related IMs focused exclusively on suppression. We recommend BLM combine both approaches, maintain the emphasis on suppression, and then identify fuel breaks as a tool in high risk areas.

- Risk of wildfire threat should be delineated based on biological parameters, as well as fuel load. The draft IM does not reference sagebrush species or subspecies, precipitation zones, or presence of annual grasses in the understory in the list of factors to consider when establishing fuel breaks. We strongly recommend BLM incorporate and address these parameters in the IM. Our rationale for including these parameters is as follows:

    - We are seeking to avoid fragmentation where fire risk is low;
    - We are seeking to reduce the spread of annuals; and,
    - We are seeking to avoid disturbing healthy sagebrush communities in high precipitation zones where the risk of fire is relatively low.

2. Specific Comments (please see FWS comments on IM and associated materials, attached).

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