

From Analysis Paralysis to Agency-Community Collaboration in Fuels Reduction for Fire Restoration: A Success Story

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Abstract—In 1996, the Ashland Ranger District of the Rogue River National Forest proposed the HazRed Project to expand a shaded fuelbreak system within the Ashland municipal watershed. The original proposal sparked intense community opposition and was withdrawn following administrative appeals. The Forest then proposed the Ashland Watershed Protection Project and used collaborative methods to generate continuous substantive public input. When a final decision was issued in 2001, the Project had gained enthusiastic community endorsement with volunteers helping to implement it on-the-ground. This story offers useful lessons for successfully overcoming “analysis paralysis” in fuels reduction and forest restoration projects.

Introduction

In the winter of 2001, former chief of the U.S. Forest Service Jack Ward Thomas complained in testimony before Congress that the Forest Service was suffering from “analysis paralysis.” The intended message was that it was becoming increasingly difficult for forest managers to implement management projects in a timely fashion due to a burdensome number of conflicting environmental regulations requiring lengthy public processes. In the public policy literature, “analysis paralysis” is a concept referring to an overload of data that makes it difficult to analyze effectively. The problem of the Forest Service, it is argued, is not due to an overload of data, but an overload of public controversy. Controversies are often generated by management proposals that involve commodity timber extraction, especially when these projects are presented as something else such as fire hazard reduction or forest restoration projects.

Individuals and organizations affiliated with the conservation community have been particularly adept at asserting their rights under agency regulations and the nation’s environmental laws to prolong environmental analyses and decision-making. Forest Service decisionmakers sometimes misinterpret the public opposition to commercial logging as opposition to all forest management in general. The need for hazardous fuels reduction and forest ecosystem restoration, however, has created new management opportunities for both conflict and cooperation between federal agencies and local communities. The following paper will present the story of how a progressive Forest Service Ranger and a conservation-minded local community were able to teach and learn from each other, and transcend “analysis paralysis” over a contentious timber sale proposal, to eventually reach consensus on a restoration-oriented fire hazard reduction project within a municipal watershed. It promises to become a model of agency-community collaboration in fire restoration work,

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with long-term ecological and social benefits to the local landscape and wider society.

The HazRed Project

Draft Environmental Assessment

The Ashland Ranger District issued a scoping notice on July 5, 1996, for the “Ashland Interface Fire Hazard Reduction (HazRed) Project.” The purpose and need for the HazRed Project was to “reduce fire hazard levels in strategic areas to protect values at risk of being lost to large-scale stand-replacing fire.” The Draft Environmental Assessment (EA) was issued in February 1997 and proposed to treat 1,631 acres with a mix of commercial logging, manual cutting and piling, and prescribed underburning in order to construct and expand a ridgeline shaded fuelbreak system in the interior of the watershed. The fuelbreak would have reduced canopy closure to 30-40 percent, leaving an average 20-30 foot horizontal spacing between the crowns of dominant and codominant trees. All snags and large downed logs would be removed, and woody material on the forest floor would be reduced to an average of 1.5 tons per acre. The stated purposes of the fuelbreaks were to allow the safe deployment and evacuation of firefighters, increase the penetration of fire retardant through the forest canopy, and reduce the spread of running crownfires [Draft EA; p.4]. The Project would also have involved road and helispot construction in order to facilitate skyline and tractor yarding systems, and to shorten helicopter yarding distances.

The Ashland Municipal Watershed

Commercial logging is highly restricted in the Ashland Watershed and there were several indications that the proposed HazRed Project would spark significant controversy. First, the Project area is managed as a restricted watershed since it is the primary domestic water source for the City of Ashland. The City and the Forest Service have a cooperative agreement dating back to 1929 that requires the agency to consult with City officials prior to any plans to remove timber or other forest products from the Ashland Watershed. The watershed is characterized by steep, unstable slopes of decomposed granitic soils with naturally high rates of erosion, often in mass debris flows that dump sediment directly into streams. Just before the Draft EA was scheduled to be released, the watershed experienced a major rain-on-snow event that resulted in a 30 year flood event on New Year’s Day in 1997. Many landslides were triggered alongside logging roads, the downtown commercial district was flooded by several feet of water, and the City was forced to import potable water for several weeks. The Draft EA alarmed the community since many of the proposed fuelbreak units were rated as having extreme landslide hazards and in some cases were located directly above active landslides.

Second, the project area was located inside a critical habitat unit and late-successional reserve (LSR) established by the Northwest Forest Plan to conserve habitat for the northern spotted owl and other old-growth associated species. The Mt. Ashland LSR, coincidentally, is a critical node or “crossroads” in the LSR system, linking the high elevation Siskiyou range of the Klamath mountains with the southern portion of the Oregon Cascades and the Oregon coast range. Commercial logging is highly restricted and intensely controversial in LSRs. Forest Service staff predicted that timber extraction for the fuelbreaks would cause long-term habitat degradation for eight pairs of northern spotted owls.

Third, the Ashland Watershed is located in the Klamath-Siskiyou bioregion, a proposed world heritage site renowned as one of the richest areas of biodiversity in the North American continent. Fire has played a major evolutionary role in shaping species composition, stand structure, and the amount and distribution of live vegetation and dead fuel in the region. The watershed is comprised of a fire-dependent mixed-conifer ecosystem with a natural fire return interval of 8-15 years; however, the Forest Service has managed the watershed for fire exclusion since the early 1900s, resulting in 4-9 missed fire cycles [Draft EIS; pg. I-6] (USDA FS 1999). Part of the expressed need for the HazRed Project was to compensate for the effects from past fire suppression that resulted in excessive hazardous fuel loads. Ironically, the purpose of the fuelbreaks was to increase suppression effectiveness and continue fire exclusion.

Finally, the Ashland Watershed has prime recreational, scenic, and spiritual values for the local community. Known affectionately as “the forest at Ashland’s doorstep,” local residents have a strong sense of place and personal connection with the watershed. Unlike most other rural communities in southern Oregon, Ashland’s economy is not dependent on the timber industry; on the contrary, it is the home of Southern Oregon University and the renowned Oregon Shakespearean Festival which attracts thousands of students and tourists, generating \$45 million in revenue each year. Ashland has a reputation for being a wealthy, liberal community supportive of environmental and social justice causes. Any timber sale would have been controversial and engendered the opposition of local residents philosophically opposed to any commodity resource extraction in the watershed for any reason.

For all the above reasons, conservationists recognized the HazRed Project as both controversial and precedent-setting and thus questioned the legality of the Forest Service issuing an EA instead of an Environmental Impact Statement (EIS) for the Project. In each case, though, the Forest argued that the impacts on water quality, soils and slopes, spotted owl habitat, and scenic/recreational values from a potential “catastrophic wildfire” far outweighed the minimal impacts to be caused by commercial logging for fuelbreak construction.

Public Involvement in the HazRed Project

The local nonprofit conservation organizations, Headwaters and the Klamath-Siskiyou Wildlands Center (KSWC), were instrumental in generating community involvement in the HazRed Project. Headwaters organized some early protest demonstrations and public rallies in 1997 and wrote several articles critical of the Project’s potential environmental impacts in the organization’s quarterly newsletter. The KSWC sponsored public hikes through proposed fuelbreak units where people observed old-growth sugar pines up to 6 feet in diameter at breast height (DBH) had been marked for cutting, along with over 4,400 trees greater than 20 inches DBH, and nearly all of the understory white fir trees. The sentiment of the environmental community was that the marking was excessive and that the Project was essentially a timber sale, not a fire hazard reduction or forest restoration project. A coalition of environmentalists submitted their own alternative during the comment period that would have put a diameter cap of 17 inches DBH for trees able to be extracted. Finally, the Ashland Mayor and City Council submitted a comment letter with a number of suggestions that echoed many of the conservation community’s concerns, including the desire to construct no new shaded fuelbreaks and to focus on reducing surface fine fuels and brush rather than extracting large trees.

The community's fear that the HazRed Project would be followed by additional timber sales in the watershed in the future was prompted by the fact that one of the uses of the Project's timber sale revenues was intended to pay for completing an earlier so-called hazard reduction project. The Helikopter Salvage Sale had been logged in 1990/91 but had left behind thousands of submerchantable trees and had left untreated over 200 tons per acre of logging slash, which contrasted with the natural fuels accumulations of 10-35 tons per acre in unlogged sites [Draft EIS; pg. III-1] (USDA FS 1999). As is the case with nearly every proposed hazard reduction project involving a timber sale, the Forest Service intended to do the commercial logging first, then perform the restoration activities later using the timber sale receipts. This only fed into the public's perception that commercial timber extraction was the primary objective of the Project.

The District Ranger responded to the community's concern about excessive timber marking by literally walking the units with her staff and deciding on a tree-by-tree basis which ones specifically contributed to fire hazard, and which ones did not. On her own initiative, the Ranger ordered thousands of trees to be demarked, decreasing in half the amount of 20 inch DBH trees that were going to be logged, retaining all sugar pine and cedar trees, and allowing isolated clumps of large healthy trees to remain uncut [Final EA; APP. B, pg.29] (USDA FS 1998). This good faith gesture struck a responsive chord and personally endeared the Ranger among the Headwaters organization and other members of the local community. But it still did not sway the conservation community's belief that the HazRed Project was simply using the rationale of fire hazard reduction as an excuse to "get the cut out."

Final Environmental Assessment and Decision Notice

The Final EA, Decision Notice (DN), and Finding of No Significant Impact (FONSI) for the HazRed timber sale were issued simultaneously in March 1998. The decisionmaker announced that the Final EA was a complete revision and cautioned readers to avoid comparing it with the Draft. A notable and positive change was the cover of the Final EA. The cover of the Draft EA had displayed a photograph of a huge black, billowing smoke cloud rising above the city of Ashland during the 1959 Ashland Fire. Local environmental advocates were critical of the use of that old photo, perceiving it as an attempt to use scare tactics to win short-term public support for the timber sale at the possible long-term expense of community support for prescribed burning in the watershed. In response to this criticism, the Final EA did not use the photograph again; instead, the cover contained a candid statement from the Ranger declaring that she had not intended the photo to be used as "an alarmist approach to frighten citizens unduly." Inside the document, much of the information was reorganized and included several additional scientific references (including papers by Agee et.al. 1996 on crownfires, and Omi 1997 on fuelbreaks). Another change was that the Ranger selected a new preferred alternative, which had slightly less acres of logging compared to the original proposed alternative. The DN dropped new road construction and reduced the total acreage to be treated down to 1,472 acres, of which 457 acres were to be commercially thinned and 1,015 were to have noncommercial treatments.

While the selected action was slightly modified and the environmental impacts were reduced, the objective of the Project remained the same: to maintain and increase the effectiveness of the existing shaded fuelbreak system using commercial thinning for overstory removal. The Forest Service emphasized

that portions of the 1959 Ashland Fire had been successfully contained along segments of a fuelbreak cut by the Civilian Conservation Corps (CCC) in the 1930s; however, the agency downplayed the fact that only understory brush was manually removed during the construction of that CCC fuelbreak, and that the 1959 wildfire had also breached other portions of the fuelbreak. Regardless, the Forest held fast to its argument that a ridgeline fuelbreak system would strategically “compartmentalize” the watershed and accomplish the following fire hazard reduction goals: 1) reduce surface fuel conditions and surface fireline intensity; 2) reduce fuel ladders and crown fuels that contribute to the start and spread of crownfires; 3) allow for penetration of fire retardant; 4) provide safe areas for firefighter deployment and evacuation; and 5) provide control points for prescribed underburning [DN; pg.3] (USDA FS 1998).

The fuelbreak strategy gained the official approval of the Regional Ecosystem Office which provided internal oversight on projects proposed in LSRs. Indeed, the Regional Director of Fire and Aviation Management, Mike Edrington, wrote a letter to the decisionmaker praising the HazRed Project. “We see the HazRed project as an example of the type of treatment that must be implemented on a much larger scale in the Pacific Northwest if we are to improve the health of fire adapted ecosystems for long term sustainability,” Edrington wrote. Accordingly, environmentalists considered the HazRed to be a dangerous precedent, essentially functioning as a “Trojan Horse” that would justify timber sales in all other LSRs under the guise of fire hazard reduction.

Despite internal agency approval, critics pointed to new analysis of the local fire history that clearly showed the highest fire risk to the watershed came from ignitions in lower elevations primarily adjacent to residential and recreational areas and roads. Furthermore, topography and prevailing up-valley winds carried fires from the urban interface zone up into the watershed. This was precisely the ignition and fire spread pattern of the arson-caused Ashland Fire in 1959. Never had fires started in high elevation areas of the watershed and then burned rapidly downslope against the wind to reach the City. Critics challenged the logic of locating fuelbreaks in the middle of their watershed, asking the rhetorical question, “Why would you want to build a moat in the middle of your castle?” They preferred to locate fuelbreaks within the wildland/urban interface (WUI) zone on predominantly non-federal land where both fuel hazards and fire risks were rated high to extreme, and where suppression actions could prevent fires from spreading into the LSR and watershed and/or private homes.

Administrative Appeal and Withdrawn Decision

Although the Ranger had voluntarily issued an additional 30 day comment period for the Draft EA, thereby expanding it to a full 60 days, she issued the DN without first circulating the significantly revised Final EA for public comment. Conservationists suspected that the DN was rushed forward without a new comment period in order to avoid an impending injunction against logging projects that was part of a successful lawsuit over the Forest Service’s failure to comply with the Northwest Forest Plan’s Survey and Manage requirements. The HazRed timber sale generated six appeals by environmental organizations and a local private citizen. A number of substantive and procedural NEPA claims were raised, including the fact that there was no opportunity to comment on the significantly revised Final EA. It was this specific issue that in July 1998 the Regional Appeals Review Officer cited in ordering the DN to be withdrawn.

Conservationists' Critiques of the HazRed Project

It would be instructive to briefly review some of the main fire and fuels-related critiques of HazRed because these critiques have been raised on similar fuelbreak construction, fuels reduction, and forest restoration projects elsewhere in the National Forest System.

Need to Develop a Wider Range of Alternatives

One of the criticisms raised against the Project was that the Draft and Final EAs failed to contain a broad enough range of alternatives. Specifically, conservationists wanted analysis of an alternative that would have used only non-commercial methods for hazardous fuels reduction. In fact, an alternative that would have only used prescribed underburning was originally considered during the development of the Draft EA. The document acknowledged that underburning would have reduced surface and ladder fuels, but this alternative was dropped from further development because it would not have accomplished the desired canopy reduction in mid-to-large sized trees within fuelbreaks [Draft EA; II-7] (USDA FS 1997). In order to remove overstory trees and reduce the risk of crownfire spread, the agency insisted that logging was simply a management “tool,” not a goal, and reminded the public that any timber outputs generated by the Project would not contribute to the Forest’s Probable Sale Quotient.

The claim that “logging is a tool, not a goal” is being widely repeated in National Environmental Policy Act (NEPA) documents for Forest Service fuels reduction/forest restoration projects. This claim is often met with considerable skepticism by environmental interest groups and members of the public who generally mistrust government agencies. Additionally, non-logging alternatives are rarely voluntarily developed by the Forest Service without enormous public pressure first being applied. Hence, however sincerely believed by proponents, the assertion that “logging is only a tool” is failing to mollify critics who still see timber extraction as the main driver of Forest Service land management decisions. Indeed, the silvicultural prescriptions for the HazRed fuelbreak units emphasized the need for “adequate turn volume” for helicopters—the amount of timber taken in each flight from the logging unit to the landing zone—and specified that only trees 10 inches DBH or above would be removed. Timber markers were instructed to select a minimum of 500 board feet contained in five or six trees within a 50 foot radius for each helicopter load. These prescriptions clearly prioritized profitable logging operations over effective hazard reduction, and harkened back to the Helikopter Salvage Sale that had taken mainly commercially valuable large trees, leaving behind the more flammable submerchantable small trees.

Need to Analyze the Environmental Effects of Fire Suppression

Since the advent of the “forest health crisis” in the early 1990s, the Forest Service has begun acknowledging the adverse ecological effects of fire exclusion on fuel loads, stand structure, and tree stocking levels; however, the adverse environmental effects of fire suppression have never been analyzed or disclosed in a programmatic NEPA analysis. Whenever this analysis has been specifically requested in Project-level NEPA documents, the agency has often claimed as it did in the HazRed Project that “fire suppression is an emergency response activity that does not require environmental analysis to be conducted according to NEPA regulations” [Final EA; APP. B; pg.14] (USDA FS 1998). Conservationists urged the Forest Service, to no avail, to fully disclose the potential indirect and cumulative effects of conducting fire suppression activities

within and adjacent to fuelbreaks. Doing so, they argued, would help the agency make the case for the need for proactive fire hazard reduction projects as a means of avoiding reactive fire suppression actions. A fundamental question had failed to be asked by the agency: are the impacts of logging and *using* fuelbreaks for firefighting more or less significant than the effects of wildland fire alone?

The Fire Management Plan for the LSR stated, “Shaded fuelbreaks do not contain and control wildfires on their own. It takes available, trained, skilled suppression resources to take advantage of the shaded fuelbreaks” [LSRA; D-23] (USDA FS 1996). Some of the foreseeable environmental impacts that routinely occur during suppression operations and could happen within fuelbreaks include: habitat tree felling for cutting firelines, helispots and safety zones; soil disturbance by heavy equipment and handcrews constructing firelines; chemical contamination of soil and water by retardant drops and refueling saws, pumps, and vehicles; and severe and/or homogenized fire effects by burnout and backfire ignitions. Moreover, since “worst case” scenarios were used to analyze the effects of future wildfires, critics insisted that “worst case” scenarios should be used to analyze the effects and effectiveness of future fire suppression actions within fuelbreaks. This would entail total, aggressive suppression under extreme weather conditions along the complete length of the fuelbreaks system.

Need to Address Structural Fire Protection in the Wildland/Urban Interface Zone

Despite the fact that HazRed was identified as the “Ashland Interface Fire Hazard Reduction Project,” and that “Human Life and Property” was put at the top of the list of values at risk, nowhere else in the NEPA document was the issue of structure protection in the WUI zone addressed. The Draft EA did not explain how human life and private property within the city of Ashland would be protected by the proposed shaded fuelbreak located deep in the interior of the watershed.

There have been several other proposed fuelbreak timber sales on National Forest System lands using the rationale of “community fire protection;” yet, general problems remain from the lack of a precise, science-based definition of the WUI zone and lack of empirical evidence that fuel and vegetation treatments conducted several miles away from communities will in fact help protect private structures from wildfire damage. According to research conducted by the Forest Service’s Fire Sciences Lab in Missoula, Montana (Cohen 1999), the prime zone for vegetation treatments to effectively and efficiently reduce home ignitability factors is approximately 200 feet surrounding structures. In the case of the HazRed Project, the proposed fuelbreaks would have been constructed several miles and ridgelines away from the city, offering dubious benefits, if any at all, to structural fire protection needs. This points to the general need for projects to clearly demarcate fuels treatments in wildlands conducted for ecosystem restoration purposes from fuels treatments in the WUI zone conducted for community protection purposes.

Need to Implement the Federal Wildland Fire Policy

The 1995 Federal Wildland Fire Management Policy and Program Review (Federal Fire Policy) and the 2001 Review and Update of the Federal Wildland Fire Policy signify a potentially profound change in federal fire management philosophy. The letter and spirit of the Federal Fire Policy commits agencies to genuinely move away from systematic fire exclusion toward prescribed and wildland fire use for the restoration of fire-adapted ecosystems. The most

urgent institutional need and highest priority action item for implementing the Federal Fire Policy was the development of new Fire Management Plans (FMPs). According to the Federal Fire Policy, FMPs are required for every area on federal lands subject to wildland fire, or every acre containing burnable vegetation. These FMPs offer the strategic framework for the full range of fire management projects and actions, from hazardous fuels reduction and forest restoration projects to fire prevention campaigns and fire suppression incidents.

The HazRed Project failed to tier to the Federal Fire Policy or discuss how, if at all, the Project complied with the Policy in terms of fire reintroduction and forest restoration goals. Critics were concerned that the proposed fuelbreak was designed solely for the purpose of containing wildfires, thus continuing the Rogue River National Forest's obsolete fire exclusion-based FMP in the watershed's fire-dependent ecosystem. Critics asserted that implementing a fuels reduction project before the Forest first developed a new Fire Policy-compliant FMP was "putting the cart before the horse." Even worse, the two were disconnected and heading in opposite directions: the HazRed Project was oriented toward continued fire exclusion while a Policy-compliant FMP should be oriented toward fire reintroduction and ecosystem restoration.

Need to Ensure Proper Fuelbreak Maintenance

An inherent challenge with extensive fuelbreak systems is the need for periodic maintenance to retard the growth of flammable native and exotic vegetation that can thrive in exposed, logging-disturbed sites. Without maintenance, fuelbreak sites can convert from a timber fuel model to a grass or brush fuel model and actually result in increased fireline intensity and rate of spread, thus undermining the stated purpose for safe, efficient fire suppression actions. Part of the HazRed Project involved commercial thinning and prescribed burning in portions of existing fuelbreak segments that were logged 10 years earlier. However, an abundance of smaller, submerchantable trees had been left behind from the timber sales, and manzanita brush had rapidly grown in the opened canopies. These small trees and brush made these sites largely ineffective as fuelbreaks. Because the Forest had failed to adequately maintain existing 20-year-old fuelbreaks, this did not give the community much assurance that the proposed new fuelbreaks would be maintained for the next 200 years—the timeframe that the Forest had used to analyze the effects of the fuelbreaks in protecting the watershed from future large-scale "catastrophic" fires. Additionally, the use of chemical, mechanical, manual, and prescribed burning methods for fuelbreak maintenance cause their own cumulative impacts, which needed to be analyzed along with the effects of fuelbreak construction.

The Ashland Watershed Protection Project

Draft Environmental Impact Statement

The Regional Office instructed the decisionmaker to withdraw the DN and issue an additional 30 day comment period for the revised Final EA. At the Ranger's own discretion, however, she decided to conduct a more extensive environmental analysis and develop a new Draft EIS. The HazRed Timber Sale Project was renamed the Ashland Watershed Protection Project (AWPP). The purpose and need for the AWPP was to provide high quality drinking water and maintain large areas of late-successional habitat by creating a "fire resilient landscape relatively resistant to large-scale high severity wildfire" [Draft EIS; S-1] (USDA FS 1999).

The Draft EIS included a range of four action alternatives (instead of only two that had been in the HazRed EA). Alternative One was the No Action alternative required as the baseline for comparing the action alternatives. The objective of Alternative Two was to protect late-successional structure and treat understory vegetation and surface fuels using prescribed underburning as the only treatment method. It sought to replicate, to the extent possible, the historical fire cycles for the Project area and restore historical vegetation conditions in the watershed. Alternative Three stressed protection of soils and site productivity by using manual treatments (e.g., cutting with chainsaws and handtools) and “swamper burning” (continuously feeding material into small piles about 4-6 in feet diameter) to selectively remove shrubs, small trees up to 8 inches DBH, and jackpots of dead surface fuels, rather than mechanical treatments with fellerbunchers and skidders. Cutting with chainsaws and hand tools only and small pile and swamper burning would avoid the impacts on soils from both heavy equipment logging and broadcast prescribed burning. Alternative Four would try to minimize changes to late-successional forest structure while reducing fire hazard. It proposed using a combination of treatment methods including mechanically removing trees up to 17 inches DBH, manual treatments, and prescribed underburning, but would not construct or expand shaded fuelbreaks. Slash and fuels would be burned by a variety of methods and possibly chipped and hauled away for biomass. Alternative Five, the preferred action, was essentially the proposed action in the HazRed Project, and its goal was to maximize fire hazard reduction using all of the above treatment methods and maintaining, expanding, and constructing shaded fuelbreaks, with no diameter limit on the trees slated for mechanical removal.

The AWPP was a significant improvement over HazRed on some but not all issues. As an EIS, the AWPP did provide a much wider range of alternatives, including two alternatives using noncommercial methods. However, conservationists were critical of splitting up the manual treatments and prescribed underburning into two separate proposals. They believed that combining those methods would have successfully reduced surface and ladder fuel loads, raised the crown base height, and increased the average stem diameter in ways that would have significantly reduced the risk of crownfire initiation. This would have reduced the need to extract large trees in order to reduce crownfire propagation.

The Draft EIS also disclosed the existence of the Federal Wildland Fire Policy and its nine guiding principles, but the Ranger dropped from consideration an alternative that would have utilized Wildland Fire Use for Resource Benefits (WFURBs) precisely because the Forest’s existing suppression-based fire-exclusion-oriented FMP did not allow for WFURBs in the watershed. It was assumed throughout the analysis that fire suppression would occur, and the Draft EIS even provided some crude estimates of the potential costs of future suppression for each alternative. Unfortunately, the Draft EIS did not analyze the potential environmental impacts of suppression within the fuelbreaks. Later, in the Final EIS, the agency would argue that a Forest Plan Amendment or Revision would be necessary in order to fully implement the Federal Fire Policy and utilize WFURBs [Final EIS; App. I-10] (USDA FS 2001a).

The Ashland Watershed Stewardship Alliance

Prior to the release of the Draft EIS, the District Ranger took the initiative to reduce some of the tension that had flared up in the community over the original HazRed Project and seek active citizen involvement in the AWPP. She contacted the Peace House, a local nonprofit organization affiliated with the National Fellowship of Reconciliation, and asked them to organize a “community dialogue meeting” in February 1999. As a neutral ground with a large

amount of credibility in the community, the Peace House brought together the Ranger and environmental activists for face-to-face discussions about the forthcoming AWPP. From the original small gatherings, the group decided to meet regularly and expand the base of participants. Representatives of the City of Ashland, business owners, forest workers, and community organizers met twice a month from March through August when the Draft EIS was released. In September, the group named themselves the Ashland Watershed Stewardship Alliance (“the Alliance”). They began to meet twice weekly and set up four subcommittees that reported to the larger group. About 40 people actively participated in the Alliance meetings, with some gatherings attracting over 100 people sitting in a large circle at the Peace House to discuss competing and complementary visions on how to protect and restore the Watershed. Although the District Ranger did not directly participate after the first few meetings, the community recognized that it was her initiative and tacit ongoing support that kept the Alliance meeting regularly and working for a new, constructive, collaborative relationship between the agency and community.

The Stewardship Alliance was comprised of highly experienced and skilled people, including Headwater’s staff, a member of the Society of American Foresters, the Ashland City Forester, a retired Forest Service economist, as well as other credible scientists, foresters, and environmentalists residing in the community. The Alliance produced a 95 page proposal that was submitted on the last official day for comments on the Draft EIS. The preamble to this document is noteworthy for the spirit of collaboration it conveys:

“We, involved citizens of the Ashland Watershed, look to deal constructively with conflict and promote a collaborative relationship between the Forest Service and the people of this community. As neighbors within this forest, we share a common interest to begin the work necessary to mitigate the risks of wildland fire within the watershed, restoring a forest ecosystem which will be resilient to periodic natural fire events. We seek to accomplish this goal while maintaining the ecological, social, aesthetic, spiritual, economic and educational qualities which the people of this region value in these forests...Working with the Ashland Ranger District we hope to develop alternatives which can cover the costs, while building a lasting and mutually beneficial relationship with the agency—one which utilizes local expertise, folds local values into the planning process, and builds a culture of long-term stewardship between the citizens of this community and the land” (Ashland Watershed Stewardship Alliance 1999).

The Alliance’s Proposal presented a number of ecological, social, and economic goals and principles that they wished to be applied toward development of a new alternative for the Final EIS. It is beyond the scope of this paper to present the complete list (Ashland Watershed Stewardship Alliance 1999), but the following items are worth emphasizing because they are increasingly being requested by conservationists participating in fire and fuels related Project proposals. Under the category of Ecological Goals and Principles: 1) Focus fire hazard reduction activities primarily on reducing the fuels from the brush and smaller understory trees that have increased above natural densities due to fire suppression; and 2) Accomplish different aspects of the project in a sequence that allows for non-controversial treatments to proceed as soon as possible, so that lessons can be learned and applied later.

Under the category of Social Goals and Principles: 1) Develop and nurture the shared responsibility of the community for the stewardship of the Ashland

watershed (including planning, funding, implementation, and monitoring); and 2) Establish a process encouraging participation by all interested parties in an open and transparent manner that leads to understanding and trust.

Finally, under the category of Economic Goals and Principles: 1) Base the decisions for fire reduction work on sound ecological guidelines and not on the extraction of commercial material to meet Project funding needs; and 2) Work with the U.S. Forest Service in developing new funding structures for the fire hazard reduction project and if needed to secure additional funding sources for the work (Ashland Watershed Stewardship Alliance 1999).

Among a number of technical items in the Alliance's Proposal, they recommended a fire management strategy of area-wide vegetation treatments instead of shaded fuelbreaks; preferred the use of manual pre-treatments with prescribed underburning instead of mechanical thinning in order to better conserve soil and vegetation on geologically unstable slopes; demanded an active monitoring plan with secured funding; and desired a phased implementation of project activities over time. The group felt that it was important to proceed immediately on the activities that were non-controversial and enjoyed broad community support. This meant the first phase of the Project would utilize manual treatments to cut brush and small trees under 8 inches DBH in the interface areas directly bordering residential sites. The second phase would then be to combine manual treatments with prescribed underburning. The third and most controversial phase of the Project would be to do maintenance on the existing fuelbreaks, which if necessary could involve removing some large trees. The fourth phase would be to develop a comprehensive long-term fire restoration plan for the whole watershed, based on the lessons learned in the prior three phases. The Alliance gained endorsements for their alternative proposal from all of the area's environmental organizations, a wide spectrum of community organizations and private citizens, and most importantly, from the Ashland Mayor and City Council who gently reminded the Forest Service of their 70-year-old Cooperative Agreement regulating management activities in the watershed.

As mentioned, the Alliance expressed the desire to work with the Forest Service to develop innovative, non-traditional funding mechanisms such as service contracts and special use permits to get the needed work done. For example, the Alliance offered to create its own non-profit, bonded general contracting arm to bid on high priority, low revenue producing units that would not likely attract traditional contractors. The non-profit could offer below-market bids on service contracts, and then accept donations from local citizens and businesses to help cover expenses. These and other initiatives represented sincere desires by the Alliance and the local community to work with the Forest Service to implement widely supported hazard reduction activities in the watershed while avoiding the need for a controversial and potentially divisive commercial timber sale.

The Ranger decided to extend the initial 45 day comment period on the Draft EIS by an additional 30 days. She conducted a public "learning meeting" on September 1, 1999, to make herself and her staff available for questions about the Draft and address the public's interests and concerns. Even more impressively, she allowed citizens to check out keys to the Forest Service's locked gates in order to access portions of the Project area that were normally restricted. Of the 39 comment letters received (several of them contained the signatures of multiple individuals and/or groups), 21 letters expressed support for the Alliance's vision of proactive community involvement in all of the fire hazard reduction activities stages (planning, implementing, and monitoring) in the Watershed and WUI zone [Final EIS; App. I-3] (USDA FS 2001a).

Final Environmental Impact Statement

The Final EIS was issued on January 2, 2001, and included the important addition of a new alternative developed in response to public comments. Learning from the past mistake, the decisionmaker provided a 30 day comment period on the FEIS. The Stewardship Alliance was disappointed that the decisionmaker did not agree with them on some issues; nevertheless, the Final EIS represented a significant improvement over the Draft, with five times more acres to be treated with noncommercial methods, much less commercial thinning, and most importantly it included a new preferred alternative that was inspired by the Alliance's proposal.

Alternative Six, the agency's new preferred alternative, addressed the controversies surrounding overstory tree removal and shaded fuelbreak constructed by implementing a phased schedule of fuel treatments, beginning with surface fuel reduction in the WUI zone, prior to treatments to maintain existing ridgeline fuelbreaks in the interior of the watershed. The alternative also called for implementation of manual surface and understory fuels reduction for the first three years of the Project. For the next 3-5 years, mechanical thinning would occur, followed by prescribed underburning, all in the WUI zone. No new shaded fuelbreaks would be constructed, and although it would still remove overstory trees, it would not follow the same canopy spacing prescriptions (e.g., 20-60 feet spacing between individual tree crowns) proposed in the previous proposed actions in HazRed and the AWPP. The whole process of reducing fire hazards on 1,549 acres was estimated to take 8-12 years to complete, with implementation and effectiveness monitoring to be conducted at each stage. Alternative Six was analyzed as the most costly to implement, but the Alliance felt that the more costly, the better, since they believed that restoration activities should be funded through appropriated budgets such as the Hazardous Fuel Reduction fund within the National Fire Plan, and not have to depend on revenues derived from commodity timber extraction.

Record of Decision

The Record of Decision (ROD) for the AWPP was issued on May 25, 2001—fully five years after the initial HazRed Project was first proposed. The Ranger noted that it had been “a protracted agency process with stunning citizen involvement” [ROD; p.2] (USDA FS 2001b). She commended that “the Forest Service is fortunate to have membership with a community so committed to building its capacity to leverage diversity and resources to address difficult, and sometimes seemingly irresolvable, natural resource and social issues” [ROD; p.2] (USDA FS 2001b). It is significant that the Ranger considered herself and the District staff to be members of the community. A year earlier (June 2000) she was fired by the Rogue River Forest Supervisor in his last official act before retiring from the Forest Service. The alleged reason for her dismissal was her “incompetent management style.” Community members believed, however, that she was fired because her management style emphasized active involvement and community collaboration, in contrast to the agency's traditional technocratic style. Dozens of local citizens called the Regional and Washington Offices of the Forest Service to complain. The result: two days after she had been dismissed she was fully reinstated as the Ashland District Ranger, and the community was elated. Clearly the Ranger considered herself, and was considered by local residents, to be a member of the community.

Acknowledging that the removal and sale of large trees was the most contentious aspect of the Project and provoked “vehement resistance” from citizens, the Ranger selected a modified Alternative Six that deferred for

several years the commercial logging planned along ridgeline fuelbreaks, and imposed a diameter limit of 17 inches DBH for trees to be commercially thinned within the WUI zone. Citizens had long pushed for this diameter cap based on the Mt. Ashland LSR Assessment, which disclosed that trees larger than 17 inches DBH contribute to habitat quality for northern spotted owls. The ROD also withdrew the new road reconstruction and eliminated a proposed helispot that was the site of an old-growth ponderosa pine stand containing some of the biggest trees originally proposed for cutting. If and when commercial thinning for fuelbreaks might occur in the future, eliminating that new road and helispot will result in longer helicopter flights, ultimately making the logging more expensive to implement. Regardless, the Ranger justified her decision by saying that the citizen's and the City's environmental concerns far outweighed the agency's desires for least-cost project implementation and maximum fuels reduction effectiveness.

Finally, the Ranger acknowledged the benefits of community collaboration and outlined several opportunities for citizen volunteer participation and continued involvement in the Project's implementation. For example, the Ranger offered to help organize "volunteer days for community participation" in pre-treatment data collection and post-treatment monitoring to train citizen volunteers in manual fire hazard reduction techniques and to let them actually assume responsibility for treating selected units. The Ranger's appeal for citizen volunteers included helping to unmark all the previously marked trees within units dropped from mechanical treatments. In addition to helping to train and organize citizen volunteers, the Forest also promised to implement the Project with a variety of methods that utilize local labor resources, including the awarding of "best value" service contracts.

Although the ROD had successfully addressed the majority of the conservation community's concerns, the Klamath-Siskiyou Wildlands Center (KSWC) did appeal the portion of the Project that would have used commercial thinning in high risk landslide areas. In an informal disposition meeting, the Ranger agreed to drop all units in those landslide-prone areas, and thus reduced the total logging acreage down to 116 acres—fully one-fourth the acreage of the original HazRed proposal. The KSWC dropped their appeal, and the Project has been carried forward with the active support and involvement of the KSWC. The Ranger has gained the trust of the local conservation community who feels that under her leadership the Project has been transformed from essentially a pre-suppression timber sale into a genuine fuels reduction for fire restoration project.

Conclusion

The Ashland Ranger District has begun implementing the AWPP, and it has received priority National Fire Plan funding in Region 6 precisely because the Project had gained extensive community involvement and support. Both the District Ranger and the local conservation community should be credited with the willingness to communicate and collaborate in creating a management project that is both environmentally sound and socially acceptable. The fact that the Ranger did not come from a traditional forestry background, but instead, had an educational background in communication and leadership may account for her remarkable success in listening and learning from the community and leading her staff to develop a truly innovative Project. She is continuing to serve as a facilitator of community-based stewardship, working on a proposal with the City of Ashland and Southern Oregon University to create the

“Southern Oregon Institute for Watershed and Citizenship Studies” to help increase agency and community capacity for ecological restoration of public lands (Duffy 2001).

The Project’s manual cutting and burning treatments will be expensive, but the National Fire Plan funding for Hazardous Fuels Reduction treatments comes at the perfect time for these noncommercial treatments. The Ranger, the Stewardship Alliance, and the City have also pledged to leverage the funding by organizing groups of volunteers to help implement the Project on the ground. A subgroup of Americorps called “REALcorps” (Regional Ecosystem Applied Learning) is organizing community work parties to do hand-piling of fuels, and the nonprofit Lomakatsi Restoration Project has received grants from the National Fire Plan fund to train local citizens in hazardous fuels reduction and restoration techniques. Local groups of students and Boy Scouts are also getting involved in cutting brush in the WUI zone. The Forest Service is experimenting with different kinds of service contracts to allow community groups to design their own manual hazardous fuels reduction prescriptions on three acre parcels of land. In sum, the community is taking several initiatives to implement the Project, and the Forest Service is playing a supportive role by providing technical assistance. This represents a most novel approach to agency-community collaboration: teaming up the expertise and authority of the agency with the volunteer labor power of the community to get the work done for mutual benefit.

The legacy of the Ashland Watershed Protection Project is a matter of perspective. To some Forest Service officials, the Project’s prolonged analysis, successful appeals, and deferral of the timber sale represents a humbling erosion of managerial power. To other agency employees, the Project represents an important breakthrough in gaining the consensus of “hardcore” conservationists for active management in a forest reserve. To the local community, the Project symbolizes a new social solidarity and unprecedented opportunity to assume some civic responsibility for stewardship over the public lands they hold dear. The phased implementation of the Project, starting with noncommercial manual and prescribed burning treatments first, followed by implementation and effectiveness monitoring, and then later mechanical treatments possibly including commercial logging, created a successful solution to overcoming controversy and “analysis paralysis.”

According to a local resident who actively participated in the NEPA process and helped develop the Stewardship Alliance’s proposal, “Despite the prolonged and difficult process, the AWPP is evidence that NEPA actually works. Although it is time and energy consumptive, if followed faithfully the NEPA process produces projects that can unite instead of divide communities” (Lininger, personal communication). In this regard, the Ashland Watershed Protection Project offers a working model for agencies and communities to move forward together on implementing fuels reduction and forest restoration projects throughout the National Forest System.

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