Blue Ridge Environmental Defense League

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US Forest Service Supervisor
160 Zillicoa St., Suite A
Asheville, NC 28801

RE: The Grandfather Restoration Project

On behalf of the Blue Ridge Environmental Defense League, I write regarding the Grandfather Restoration Project and its impact on the Linville Gorge Wilderness Area. In brief, we believe deficiencies in the proposal disqualify it from funding. Further, we question the practice of prescribed burns in forest wilderness areas on the basis of environmental restoration and public health.

Overview

As you know, the 12,000 acre Linville Gorge Wilderness Area comprises a large part of the Grandfather District. According to the US Forest Service, the Grandfather Restoration Project is ña 10-year effort that will increase prescribed burning and other management practices to more than 40,000 acres of the Grandfather Ranger District, Pisgah National Forest.ò

The Blue Ridge Environmental Defense League has been interested in the management of our National Forests since the mid-1980s. We are a regional, community-based, non-profit environmental organization. Our founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. BREDL has chapters throughout the Southeast and our members depend on the National Forests for providing and protecting drinking water supplies. Our members rely on the recreational use, scientific attributes and life-sustaining benefits of the National Forests.

Comments

Prescribed burns can have a significant negative impact on people; for example, pollution from a U.S. Forest Service prescribed burn in the Cherokee National Forest drifted into Smyth County, Virginia where it remained for a few days because of stagnant air. The Smyth County News and Messenger reported that several citizens experienced respiratory problems because of the smoke from the prescribed burn.[1]

Further, the general prohibition on open burning is a strategy used to reduce ozone and particulate matter, including PM 2.5, and to protect air quality. We believe the Forest Service should adhere to these same principles. How can we expect citizens to respect open burning bans when the government willfully implements huge burns? Therefore, rather than continuing its policy of burning, we urge the USFS to take steps to reduce negative impacts to air quality and public health.

[1] Comments regarding Draft EIS and Proposed Revised Land and Resource Management Plan for Jefferson National Forest, Mark Barker-BREDL Vice President, June 30, 2003

The practice of prescribed burning is questionable in the immediate case and in general. Regarding the Grandfather District, a Blue Ridge Environmental Defense League member living in Jonas Ridge, NC states:

> Regarding risk of fire, the Proposal is negligent in addressing site specific areas of the Linville Gorge Wilderness Area. The proposal states, ñFuel loads in fire adapted vegetation types are generally dangerously high in the Project Areaò. No fuel load was measured and no standard risk assessment using site specific criteria was conducted before the grant writers decided this work, which appears will fund over 11 full time jobs for the grant writing team agencies, must be done. Dangerously high fuel load areas are not necessarily candidates for prescribed burning. If the fuel load is too high, prescribed burning may be prohibitive. Mechanical thinning of small diameter trees is supposed to be performed in conjunction with prescribed burning per Title IV. Criteria and in accordance with 2012 US Forest Service Research on Prescribed Fire in the Southern Appalachians. No thinning of trees is allowed in the Linville Gorge Wilderness Area, which should eliminate this area from using prescribed fire. [2]

In the general case, the use of prescribed burns in forest management is short-sighted. Fire-adapted plant communities once covered the eastern United States, but European settlement upset this balance, often increasing fire occurrence in hardwood forests.

> Fuel accumulation rate frequently limits prescribed fire effectiveness to a short post-treatment period (2ï 4 years). Optimisation of the spatial pattern of fire application is critical but has been poorly addressed by research, and practical management guidelines are lacking to initiate this. Furthermore, adequate treatment efforts in terms of fire protection are constrained by operational, social and ecological issues. The best results of prescribed fire application are likely to be attained in heterogeneous landscapes and in climates where the likelihood of extreme weather conditions is low. Conclusive statements concerning the hazard-reduction potential of prescribed fire are not easily generalised, and will ultimately depend on the overall efficiency of the entire fire management process.[3]

In other words, the reduction of wildfires via prescribed burning is not supported by the evidence.

Respectfully,

Louis A. Zeller, Executive Director

[2] Susan Crotts, Letter to Blue Ridge Environmental Defense League, March 11, 2013

[3] A review of prescribed burning effectiveness in fire hazard reductionò Paulo M. Fernandes and Hermínio S. Botelho, *International Journal of Wildland Fire* 12(2) 117 ï 128, http://www.publish.csiro.au/?paper=WF02042