

March 2, 2006

Comments by George Terhune on the SNAMP Work Plan, Feb 28 version.

I have two comments, one minor and one major.

The minor point is that you identify a Complementary Research project as the “Quincy Library Group Administrative Study” when in fact it is the “Plumas Lassen Administrative Study” (PLAS). This is associated with the Herger-Feinstein Quincy Library Group (HFQLG) Pilot Project, but they are not the same thing.

My major comment is with regard to the Fire component of your study.

In general your conceptual framework is said to rest on two pillars:

“The premise that adaptive management involves deliberate experimentation rather than a passive trial-and-error approach...” and “This process not only includes assessing management actions but also evaluating the values and implicit assumptions that underlie management goals.” You conclude that “Thus experimental design is a crucial part of management and monitoring because it ensures that outcomes are meaningful and provides feedback on a rigorous basis.”

All that is very well said, but on at least one major issue the actual plan you then describe is seriously deficient in its application of those principles. My particular interest is strategic fuel reduction and the failure of the SPLAT strategy to meet that need adequately, and that is the issue where I find the deficiency.

The first paragraph of your Introduction correctly states that the SNFPA approach to strategic fuel reduction is based on Finney’s theoretical concept. But then throughout the rest of the paper you treat that premise as if it were fact to be assumed, not a theory that itself needs to be examined. This fails to meet your stated obligation to evaluate implicit assumptions and ensure outcomes that are meaningful and stand on a rigorous base. Any reasonable investigation and evaluation of Finney’s paper and the SPLAT strategy of disconnected area treatments would immediately reveal that: (1) Finney’s paper itself shows that continuous strips of fuel reduction treatment are always more effective than an equivalent amount of disconnected area treatments in a Finney pattern; and (2) In any case, and perhaps more important, the proposed SPLAT treatments do not comply with fundamental requirements that Finney lays out for effective employment of his theory. For a more complete critique of Finney and the SPLAT strategy, please see the attached Power Point slides and the explanatory notes associated with each slide.

Your failure to make any critical evaluation of Finney and SPLATs is all the more difficult to accept when it is put in full context of “Forest Service lands in the Sierra Nevada,” because about 20 percent of those lands are now being managed under a different fuel reduction strategy, usually called Defensible Fuel Profile Zones (DFPZs), a network of more or less continuous strips of treatment. How is it possible to put forth a plan to monitor the effects of strategic fuel reduction on Forest Service lands in the Sierra Nevada without once mentioning DFPZs in your whole plan?

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