

20 November 2023

Dear Forest Supervisors Benson and Gould,

Thank you for the opportunity to comment on the *Sequoia and Sierra National Forests Prescribed Fire Project Proposed Action for Scoping*. As a botanist, former National Park Service ranger in Yosemite and concerned California citizen, I know that it is crucial to deal with the effects of climate change—including increasing drought, torrential rain, higher-intensity wildfires, high winds, and overall ecosystem disruption.

I appreciate your public service in addressing these issues in hopes of keeping Sequoia and Sierra National Forest ecosystems healthy. I especially commend your plan to work with tribes to incorporate traditional ecological knowledge and approaches in managing fire and ecosystem health. I encourage you to engage with tribal experts at every step.

The national forests under consideration in this proposal contain 10 Wildernesses, with a total of more than 1.35 million acres: the Ansel Adams, Dinkey Lakes, John Muir and Kaiser Wildernesses in the Sierra National Forest, and the Domeland, Golden Trout, Jennie Lakes, Kiavah, Monarch, and South Sierra Wildernesses in the Sequoia National Forest.

The Sierra Nevada is my favorite place on Earth, and I have hiked in and deeply enjoyed several of these Wilderness areas. They are among the most spectacular examples of the “Range of Light” and its fascinating biodiversity and great beauty.

My main concern about the current proposal is the way it deals with federally designated Wilderness: the prescribed-burning plan lumps Wilderness with other forest lands, appearing to ignore the legal directives of the Wilderness Act.

As defined by the 1964 Act, Wilderness is “an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain...[Wilderness is] an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable...”

The methods described in this proposal for fire management—pile burning, jackpot burning, understory burning and broadcast burning, plus the attendant landscape modifications to allow this burning—do not align with the Wilderness Act. Natural processes—including lightning ignition, rather than mechanized fire management—must be paramount.

The simplest remedy for this problem would be to explicitly omit the 10 Sequoia and Sierra National Forest Wilderness areas from the prescribed-fire proposal. That approach would protect the legal and environmental status of Wilderness and would

allow a broad range of techniques to be used for fire management on other lands in the Sierra and Sequoia National Forests.

If, for some reason, Wilderness must be included in this proposal, I urge you to make distinct, legal and appropriate choices for Wilderness lands, including:

1. Commit to adhering to the Wilderness Act in the big picture and the details of this plan:
 - a. Signal this commitment throughout the document by mentioning the Wilderness Act at each point where other key laws that affect this proposal (e.g. the Endangered Species Act and the National Historic Preservation Act) are mentioned. List the 10 included Wilderness areas by name in the Special Area Considerations section on pg. 22 (pg. 26 in the pdf).
2. In the plan, lay out fire-management approaches specifically tailored to and appropriate for Wilderness.
 - a. Ideally, such approaches would involve allowing lightning-caused fire, rather than mechanized fire management, to dominate.
 - b. In heavily used areas where hazard trees must be taken down, these trees ought to be handled without creating new roads and with minimal disruption of Wilderness and Wilderness values.
3. Please note: Each of the Forest Supervisors' letters to the public about this proposal had at least one link (to the project or the comment portal) containing a typo that prevented that link from working. This is of deep concern for the public comment process: people with genuine interest in and expertise on this topic might have been prevented from commenting on it in a timely way.
 - a. Please make an exception to your stated policy and accept comments emailed to USFS staff for this scoping period. And please consider how to remedy this issue for future public involvement.

I have traveled to more than 165 of our nation's Wilderness areas to hike, photograph and backpack in these irreplaceable national treasures. Like all public lands, Wilderness faces myriad threats from climate change, pollution, overcrowding, nearby development and more. The US Forest Service is often a very thoughtful manager of Wilderness, with stipulations of the Wilderness Act held clearly in mind and carried out in action.

As you aim to protect our national forests, I encourage you to follow the letter and the spirit of the Wilderness Act in this fire-management plan. Thank you.

Sincerely,

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