

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

P.O. Box 944246

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Website: [www.fire.ca.gov](http://www.fire.ca.gov)**To Whom it May Concern,**

The California Department of Forestry and Fire Protection (CAL FIRE) appreciates the opportunity to respond to the USDA Forest Service Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System. Broadly, CAL FIRE is supportive of the Forest Service Preferred Alternative and has provided specific comments for consideration.

**1. Support for Preferred Alternative 2:**

CAL FIRE supports the Preferred Alternative (Alternative 2 – Modified Proposed Action). Climate change is contributing to more severe and widespread pest infestations, drought, and wildfire. Coupled with the effects of a century of fire exclusion, there are significant threats to mature and old-growth forests. Proactive stewardship is critical to supporting, maintaining, and recruiting mature and old-growth forests into the future. In most cases in California, the management approach should center on restoring beneficial fire as an ecosystem process through a range of treatments including targeted mechanical and non-mechanical hazardous fuel reduction, prescribed fire, cultural fire, and wildfire managed for resource benefit. As the Preferred Alternative articulates, timber harvest in mature and old-growth forests shall only be done with the explicit and primary intent of improving ecological resilience, and not for timber production. Employing proactive stewardship using the full range of management tools has demonstrated benefit in forest stands, including within mature and old-growth forests, at risk of catastrophic loss where fuel loads and densities make the entire stand susceptible to drought, pest infestation, and/or wildfire. For example, in the Mountain Home Demonstration State Forest old-growth giant sequoia mortality from the Castle Fire was roughly half as much in areas where active management had occurred. Allowing the use of targeted mechanical treatments that may include removal of moderate sized trees improves our ability to respond to mortality events, address fuel loading, reintroduce beneficial fire, protect communities in the wildland urban interface, and recruit other culturally important trees such as large oaks.

**2. Clarification on Guideline 2 (NOGA-FW-DGL-02):**

CAL FIRE has concerns over Guideline 2 (NOGA-FW-GDL-02), which states “*Where there are additional land management plan components for old-growth that existed prior to the old-growth amendment and these provide more restrictive direction for old-growth forests, the more restrictive direction should be adhered to.*” We believe this could be in conflict with the important adaptive management and monitoring requirements included in the Amendment. In our opinion it is imperative that managers have the flexibility to respond to changing conditions in an adaptive management context, and not be held to a more restrictive plan when another option may better promote forest resilience.

Alternative language could include:

**“In some cases ~~Where~~ there are additional land management plan components for old-growth that existed prior to the old-growth amendment and these ~~that~~ provide more restrictive direction for old-growth forests.; The principles of adaptive management should be considered and the more restrictive direction should be adhered to should be re-evaluated to ensure that it does not inhibit achievement of resilient forest conditions.”**

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CAL FIRE additionally supports the use of regional plans as an input to planning management of mature and old-growth forests. Assessing needs at a broad scale can mask regional variation in the extent, condition, and optimal management of mature and old-growth forests. State forest action plans can provide substantial information, as they include both assessment of forest conditions and recommendations for management. Lastly, supporting ongoing field-based monitoring such as the Forest Inventory and Analysis program are critical in this effort.

Thank you for the opportunity to respond to this important proposed amendment; CAL FIRE welcomes further engagement as the development of this Amendment continues.

Sincerely,

DocuSigned by:

*Matthew Reischman*

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Matthew Reischman

Deputy Director, Resource Management