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Comments: Please find the attached comment letter from Craig Thomas and Brent Skaggs of The Fire Restoration Group on the Sierra and Sequoia NF Rx Fire NEPA scoping document.

Dear Dean,We are highly supportive of increasing the use of prescribed fire to improve and maintain forest resilience. The original proposal our collaborative made to the Collaborative Forest Restoration Program included significant amounts of prescribed fire, derived from science-based historic levels of disturbance. The commitment in the proposal to expanded prescribed fire is what drew many of us to invest time and energy as stakeholders of the Dinkey Collaborative Forest Restoration Project since 2010.We support the use of forest-wide decisions to implement prescribed fire across the two National Forests. These decisions will be critical to advancing restoration and maintenance of all treatments across the project area. Once completed it will make planning more efficient, protect sensitive resources, restore an essential ecological process, and move the landscape towards more resilient conditions. Prescribed fire decisions for the two National Forests will complement the existing management plans for Yosemite National Park, Sequoia, and Kings Canyon National Parks, and Mountain Home State Forest and will align with the roughly 50-years of prescribed fire use on the adjacent Southern California Edison ground.The resulting environmental analysis, permitting process, and decision will also be a useful example for other National Forests. This is an important project. We offer the following comments to improve the design, analysis, and implementation of the project.Implementing the National Environmental Policy Act (NEPA)The scale of this project is very large and will be implemented over an extended period-of-time. Planning at this scale can improve efficiency. We recognize such efficiency is especially The Fire Restoration Group important when resources to plan and implement prescribed fire are scarce and the need is large. The footprint of this project-level environmental analysis, two forests covering 2.4 million acres, is among the largest ever conducted in Forest Service Region Five. It is critically important that the environmental analysis and decision making for this project be completed to the highest standards so that we can point to it as an excellent example of project planning. The analysis should include an assessment of the range of fire effects (based upon fire regime science) and also, the analysis should clearly state the associated risks of not burning at meaningful ecological scales. We are seeing that result in the 380,000-acre Creek Fire and larger uncharacteristic fires throughout California.Making Sure That Plantations Are Not Barriers to Implementing Prescribed Fire.We want to make certain that the project decision does not present any barriers to using prescribed fire within and near tree plantations. This is especially important because there are likely to be significant areas of planted stands because of the post-wildfire reforestation that is ongoing. There are two design features that address protection of plantations. One addresses the assessment of the condition of the plantations to receive prescribed fire during burn planning to determine if conditions would result in acceptable levels of mortality. This is an important design feature, since it recognizes that some tree mortality from prescribed fire is expected and needs to occur to break up the fuel continuity. We point to the 2017 Dinkey Reforestation Framework for an example of plantation assessment for successful use of prescribed fire in the Big Creek Restoration Project in 8-year-old plantations on the Sierra National Forest.The NEPA analysis should also consider variations in stocking requirements and concerns over uncharacteristic landscape uniformity/density in stand structure which moves us away from resilience. The Ecological Integrity language in the 2012 Forest Service Planning Rule (36 CFR 219.8 (a) (i) mandates the promotion and enhancement of Ecological Integrity in project planning and should include much greater flexibility in stocking standards and early fire reintroduction, all over a longer planning horizon.Finally, we support the much broader use of prescribed fire in the establishment and maintenance of fuel breaks across the two National Forests. This less dense and less complicated fuel environment is a great area for training prescribed fire practitioners and is a natural means of vegetation control compared to the use of toxic herbicides.Mechanical Treatments in Preparation for Prescribed Fire.The Proposed Action refers to mechanical or hand treatments prior to the application of prescribed fire to raise average canopy

base height where undesirable fire effects are predicted due to stand conditions. We understand the need for pre-treatment buffering Fireline and sensitive areas to achieve the desired fire effects. It is unclear to us, though, the degree to which vegetation or habitat conditions would be negatively affected using this practice. We ask that the scope and scale of alterations to habitat conditions for the affected species be evaluated in the environmental assessment and that design measures be developed to ensure the any impacts to these species are less than significant coupled with the understanding that the risks to excluding fire are also potentially significant. Pre-treatments are less likely to be needed in remote areas where knowledgeable fire and fuels staff and their burn prescriptions produce outcomes within the Natural Range of Variation (NRV).Specifically, the Proposed Action states "Without the option to conduct pre-treatment of vegetation within the implementation areas, there would be very limited areas available for prescribed burn entry (USDA Forest Service 2023d)." We think this is an over-statement and overlooks the career long work of fire managers such as Dave McCandlis on the Sierra NF and Prescribed Fire Managers on the Sequoia NF. As you recall, the historic Kings River Ranger District conducted prescribed burning from about the mid -1990's to 2010 with little or no pre-treatment. It was successful on thousands of acres because of the experience and expertise of Fuels Management Officer David McCandliss and his staff and District Ranger Ray Porter. Successful large-scale burns resulted from burn prescriptions that produce 1- to 4- foot flame lengths (Verner, Jared. 2002. Proceedings of a Symposium on the Kings River Sustainable Forest Ecosystem Project: Progress and Current Status; January 26, 1998; Clovis, CA. Gen. Technical Report PSW-GTR-183.https://www.fs.usda.gov/psw/publications/documents/psw_gtr183/Albany, CA: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture; pp 37-45).Successful implementation will depend on experienced burn bosses; we suggest the Forest develop an implementation plan for training and increasing the number of qualified burn bosses, dedicated to these landscapes, with experience assessing conditions to achieving acceptable post burn results in plantations and in areas with and without pre-treatment. We are including an excerpt for the prescribed fire section by Dave McCandliss demonstrating the value of an experienced workforce and thoughtful ignition approaches:"Our burns have cost about $70 per acre. The few burns that escaped cost twice that amount. One project in January, involving a helicopter equipped with a chemical ignition device (CID) and five personnel, underburned 1,400 acres in 2 days and cost $6.50 per acre. Ignition occurred 2 days before a predicted storm, which arrived on time. By burning during the moist seasons, little to no mop up is needed, resulting in a significant cost savings."Additionally with new (UAS) drone-based ignition resources cost estimates are likely much lower than helicopter ignitions with less personal risk to the fire workforce. For additional references on heterogeneity please see below. (Footnote 1)Comments on Proposed Project Design Features for Scoping:To FOR-2 Add Incense Cedar along with White Fir as a species to not prioritize for retention over Jeffrey, ponderosa, and sugar pine. Address the prioritization of black oak for retention, keeping in mind it has proliferated in the ponderosa pine forest type impacted by drought and wildfire creating the potential for it to be the dominant species in that forest type.To FOR-5 add the underlined text: "Since plantations, especially those containing true fir, less than 20 years old are highly susceptible to damage or loss from fire..."To FOR-6 add the underlined text: Use pre-fire shrub control, pruning of saplings and small trees, seasonal timing, and backing fire in plantations to avoid undesirable mortality and manage plantations to stocking standards based on forest type. Prioritize burning when conifers are dormant and after sufficient rains have reduced the risk of excessive fuel consumption. Avoid burning during bud elongation.For HYD-4 and HYD-8, recognize RCA's cover more than half of the historically forested land on the Sierra National Forest so these proposed design feature will be two of the most constraining, but these features should accept well-managed backing fire which was part of the historic fire-regime.ImplementationIn addition to the landscape planning at 5-year intervals described in Appendix B, the decision should include annual outreach to stakeholders, partners, and Cooperating Wildland Fire Fighting Agency Chief Officers to review the progress on the needed prescribed fire projects and identify areas where Forest Service needs additional implementation support. This annual review will help to socialize and build community and Cooperating Fire Agency support for the successful implementation of prescribed fire.The five-year planning cycle should also include a science-based, collaborative fire and smoke communication strategy as was promoted on the Boulder Rx Burn on the Hume Lake RD, Sequoia NF., that supports expanding beneficial fire and expanded efforts to protect public health in the airsheds most impacted by restorative burning.Finally, there has been a long history of multi-party and multi-agency collaboration focused on restorative burning on these landscapes. That history included Southern California

Edison, CALFIRE, Forest Service and Tribal Partners and others. With the Creek Fire and the onset of COVID restrictions and transitions of key fire staff we have lost some of that critical cohesion. We need to rebuild that cohesive vision and working partnership in the coming years as part of the landscape scale commitment implied with the prescribed fire planning effort. We already share a strong partnership:https://farmsandforests.org/Resources/Fire%20MOU%20Partnership%20Members%20Poster%20July%202021.pdf and with the collaborative work we did creating the California Strategic Plan for Expanding Beneficial (March 2022) https://wildfiretaskforce.org/wp-content/uploads/2022/05/californias-strategic-plan-for-expanding-the-use-of-beneficial-fire.pdfFinally, a key demonstration of the Forest Service's sincerity for addressing landscape scale prescribed fire would b e a stronger focus and prioritization of the 3,800-acre Teakettle Prescribed Burn in the southern portion of the High Sierra Ranger District which already has secured $5.6 million dollars in a CAL FIRE Forest Health Grant for this important restoration effort.Thank you for the opportunity to provide comments on this proposed action. We look forward to reviewing the draft environmental assessment, and ultimately supporting the expanded use of prescribed fire on the two National Forests.Sincerely,Craig Thomas and Brent Skaggscc: Kim Sorini-WilsonFootnotes:1 For more information on stand structure and fire behavior see (Zald and Dunn (2018) Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape; North et al. (2019) Reforestation for Resilience; Koontz et al. (2020) Local Forest structure variability increases resilience to wildfire in dry western U.S. coniferous forests. Levine et al. (2022) Higher incidence of high-severity fire in and near industrially managed forests.