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Title:

Comments: To the Interdisciplinary Team: We support the increased use of prescribed fire to restore ecological integrity and improve forest resilience. This project aims to improve the efficiency in planning and permitting for prescribed fire across two National Forests. When done carefully, decisions for these two National Forests also have the potential to protect sensitive resources, restore an essential ecological process, and improve landscape resiliency. The following comments are offered to improve the design, analysis and implementation of the project.

I. Mechanical Treatments The Proposed Action (PA) states that mechanical or hand treatments may be used prior to the application of prescribed fire to raise average canopy base where undesirable fire effects are predicted due to stand conditions. There are limits to the amount of such treatment that can occur by fire management zone (PA, p. 5), but there are no design measures that clarify the intensity of this treatment. For instance, will treatments that raise the base of the canopy also change the habitat type for old forest species like California spotted owl (CSO) and Pacific fisher? Clarifying the degree of habitat change expected from the mechanical treatments is important for the basic analysis of impacts, but it is also essential to compliance with the newly revised forest plans. For instance, the new forest plans for the Sierra and Sequoia National Forests have a standard related to CSO surveys that states, in part: SPEC-CSO-STD 01 For vegetation treatments that maintain or improve habitat quality in California spotted owl nesting and roosting habitat outside of protected activity centers, pre-implementation surveys are not required. (USDA Forest Service 2022, p. 62) Thus, surveys are not required for projects that do not reduce habitat quality. There are also other plan components for CSO and fisher that require an evaluation of habitat condition and potential change due to project related activities in order to apply the plan component. Is it expected that the mechanical treatments permitted in this project will "maintain or improve habitat quality" as defined in the forest plans or is the treatment intensity expected to reduce habitat quality? The expected intensity of the mechanical treatments should be clarified in the proposed action so that anticipated impacts to old forest species can be estimated. The degree of alteration of habitat is also important to determining if various forest plan standards or guidelines, like SPEC-CSO-STD 01 noted above, should be applied to the project. If the project does not intend to "maintain and improve habitat quality" the environmental analysis must include site-specific analysis of impacts. This should include an analysis of habitat condition and estimated change for each protected activity center and CSO territory. The analysis should also estimate changes in habitat for Pacific fisher that address potential impacts to fisher den clusters and buffers and suitable habitat. We recommend that a design measure be included in the PA that directs that pre-treatment maintain and improve habitat quality using the definition provided in the newly revised forest plans. See for example the definition of "maintains and improves habitat" in the forest plan for the Sierra National Forest (USDA Forest Service 2022, p. 59). Adding this design measure will ensure modifications to habitat are minor and that impacts to at-risk species that depend on mature and old forests are less than significant. This design measure will also simplify implementation of the revised forest plan components, including standards and guidelines for at risk species.

II. Plantations and Prescribed Fire We are concerned that the increasing area of plantations due to postfire reforestation will become a barrier to the landscape use of prescribed fire. Our experience with plantation establishment and management is that often trees have been planted too densely and plantations not managed for fire resilience. The approach to reforestation that we are seeing in recent postfire projects on the Sierra and Sequoia National Forests seems likely to result in high fire risk over increasingly larger, and contiguous areas. We recognize that this PA is not focused on reforestation. However, we think it is important to point out that the reforestation that is increasingly being applied does not address creating resilient, young stands. Further, the reforestation being proposed could cover thousands of contiguous acres resulting in significant areas with high fire risk over the next 20-30 years. As such, these ongoing practices could create a barrier to a much-needed prescribed fire program to increase resiliency and restore ecological integrity at the landscape scale. In light of this, design feature FOR-5 is especially important since it recognizes that some tree mortality from prescribed fire is expected to occur. We also hope it is a prompt to those implementing reforestation plans to use planting and cultural practices to maximize the resilience of the planted areas. Prescribed fire can also be used in plantations

at early stages to increase fire resilience. The Big Creek plantations are an example of how prescribed fire can be successfully applied in 8-year old plantations to improve resilience. (Footnote 1)III. Actions to be Undertaken in Wilderness AreasThe PA indicates that project activities could be applied to wilderness areas contained within the two national forests. We are supportive of increasing the use of prescribed fire in wilderness areas. However, we are unclear about the scope of activities that the PA would apply to wilderness areas.The newly revised forest plans identify that motorized equipment and mechanical transport are not suitable uses in wilderness areas. See for example the forest plan for the Sierra National Forest (USDA Forest Service 2022, p. 118). Based on this we assume that activities permitted by this decision would not allow mechanical treatment, road building, or road use by motorized vehicles in wilderness areas. But given this direction in the forest plans, we are confused by design measure SPA-3:If fire management activities are required within designated wilderness areas, research natural areas, botanical areas, giant sequoia groves, or the Pacific Crest National Scenic Trail Management Area, apply minimum impact strategies and tactics to manage wildland fire unless more direct attack is needed to protect life or property.(PA, p. 19) This addresses a situation when "fire management activities are required." Fire management activities will be "required" when prescribed fire is deployed. However, to simply require "minimum impact strategies and tactics" (MIST) to manage the event seems a lower standard than is required by the forest plan pertaining to motorized equipment and mechanical transport. We note this because our general understanding is that during suppression events, MIST is applied to wilderness areas, but that this does not prevent the use of bulldozers and other motorized or mechanized equipment when judged necessary by agency personnel.We ask that you more clearly define MIST (Footnote 2) and clarify if MIST would be applied during prescribed fire events or if it relates only to suppression events. If to be applied during prescribed fire events, please clarify if the forest plan direction on suitable uses takes precedence. Our perspective is that the direction in the forest plans on suitability of uses should take precedence for prescribed fire events.IV. ImplementationWe appreciate that the landscape planning to be done on a 5-year rotation will specifically engage stakeholders, other agencies, and Tribes. This engagement is critical to reinforce the need for prescribed fire and to foster community support for the practice. We ask that a communication and outreach strategy be included in this plan to support implementation of the project.To foster even stronger community engagement, we ask that the implementation plan include annual outreach to stakeholders and others to review progress on the prescribed fire activities and identify areas where Forest Service needs additional support. We believe that this outreach will help build and sustain support for the prescribed fire program.We thought the implementation planning steps in Appendix B made sense, but have a question about sequencing related to pre-treatment, especially mechanical treatment. According to the flow chart, pre-treatment can occur before the prescribed fire and smoke management plans are developed. This could result in substantial areas with pre-treatment completed, but no burn/smoke plans completed, and consequently prescribed fire not implemented. We want to see the prescribed fire completed, and do not want to see pre-treatment areas accumulate. Review of this and the undesirable creation of a backlog of pre-treatment areas should be included in the annual review mentioned above, with actions prioritized in the out year to limit the accumulation of pre-treatment areas.Lastly, we were struck by a review requirement in the implementation planning process described in Appendix B. The review requirement is "iii. How can the implementation action achieve treatment acreage and levels needed to confer resilience?" This implies that treatment levels to confer resilience have been established. We are not aware that they have, but believe that it is essential to do so. Such treatment levels for prescribed fire could be developed based on the natural range of variability and the fire regime for each plant community. There is extensive science to support the establishment of treatment levels for prescribed fire and to link these to resilience. We ask that you identify and discuss in the environmental analysis the prescribed fire treatment acreage necessary to confer resilience. This value should be used in the effects analysis to evaluate the amount of prescribed fire needed to benefit resilience. This value should also be used in implementation planning and the reporting of accomplishments for the project.V. Compliance With the National Environmental Policy Act (NEPA)This two-forest project covers 2.4 million acres and is among the largest projects being planned in this Forest Service region. We have been in an ongoing dialogue with the Regional Office about the vast size of recent projects and the ability to adequately evaluate and disclose sitespecific impacts, as required by NEPA.Our concerns about the ability to disclose site-specific impacts are largely focused on the mechanical treatment in the PA. We recommend including a design feature to maintain and improve mature forest habitat to address our concerns.VI. Relationship of Project

Decision to Managed Fire Events This proposal is for the implementation of prescribed fire, that is the use of planned ignitions to burn treatment areas. How will these forest-level project decisions relate to the ability now provided in the forest plan to manage unplanned ignitions for resource benefit? Are these forest-level decisions on prescribed fire intended to also provide guidance on how to achieve resource benefits from the management of unplanned ignitions? We ask that the decisions and project analysis address this in an affirmative way that provides guidance to practitioners on how these decisions and the authorities in the forest plan work together to improve resilience and restore ecological integrity. Thank you for the opportunity to provide comments on this proposed action. Please add the individuals listed below to your email circulation list for this project. If you have specific questions about these comments, please contact Susan Britting.

Sincerely, Susan Britting, Ph.D. Sierra Forest Legacy
Pamela Flick Defenders of Wildlife
Trish Puterbaugh Lassen Forest Preservation Group
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Footnotes: 1 Dinkey CFLRP Reforestation Framework: https://drive.google.com/drive/folders/1ak_T_lrC8wgU1xFt0mk16t7_dEI6hzhfH2 This USDA definition of MIST could provide a starting point: Minimum Impact Suppression Tactics (MIST) firefighting strategy is the application of strategy and tactics that effectively meet suppression and resource objectives with the least environmental, cultural and social impacts. (<https://ask.usda.gov/s/article/What-is-MIST-firefighting-strategy>)