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Organization: Dinkey Collaborative

Title: Facilitator

Comments: 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.

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. When done 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. 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 important when resources are scarce to plan and implement prescribed fire. 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 the risks associated with not burning at meaningful ecological scales.

#### 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 in 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 to occur. We point to the 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 (Footnote 1).

#### 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 in some 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 any impacts to these species are less than significant.

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)." 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 McCandless, his staff, and District Ranger Ray Porter. Successful large-scale burns resulted from burn prescriptions that produced 1- to 4- foot flame lengths (Footnote 2). 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 with experience assessing conditions to achieving acceptable post burn results in plantations.

#### 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 Riparian Conservation Area'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.

## Implementation

In addition to the landscape planning at 5-year intervals described in Appendix B, the decision should include annual outreach to stakeholders and partners to review progress on the prescribed fire activities and identify areas where Forest Service needs additional support. This annual review will help to socialize and build support for the successful use of prescribed fire.

The decision should also include a science-based, collaborative fire and smoke communication strategy that supports expanding beneficial fire and increased 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 the Sierra National Forest. It included Southern California Edison, CAL FIRE, Forest Service, Tribal Partners and others. With the Creek Fire, the onset of COVID restrictions and transfer of key fire staff we have lost some of that critical cohesion. We encourage it and the associated working partnerships to be built back to the level that preceded the Creek Fire and COVID as part of this prescribed fire initiative.

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,

PP

Dinkey Collaborative Steering Committee

Sue Britting, Sierra Forest Legacy

Erin Capuchino, Yosemite Sequoia Resource Conservation and Development District

Kent Duysen, Sierra Forest Products

John Heywood, Sierra Resource Conservation District

Melinda Van Bossuyt, Resident

cc: Kim Sorini-Wilson

Footnotes:

1 Dinkey CFLRP Reforestation Framework:

[https://drive.google.com/drive/folders/1ak\\_T\\_lrC8wgU1xFt0mk16t7\\_dEI6hzhfH](https://drive.google.com/drive/folders/1ak_T_lrC8wgU1xFt0mk16t7_dEI6hzhfH)

2 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. Tech. Rep. PSW-GTR-183. Albany, CA: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture; pp 37-45, [https://www.fs.usda.gov/psw/publications/documents/psw\\_gtr183/](https://www.fs.usda.gov/psw/publications/documents/psw_gtr183/)