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Regional Forester

U.S. Forest Service

Region 6

Dear Regional Forester,

In response to the Forest Service's request for scoping comments on the possible plan to amend the Northwest Forest Plan (NWFP) to allow more intensive forest management and tree removal ostensibly to reduce severity in wildfires and protect spotted owls, we are submitting these comments. For the following reasons, we strongly oppose any amendments that would allow or facilitate increased logging, including thinning, in mature and old-growth forests within the NWFP area.

With regard to spotted owls, we incorporate by reference Stephens et al. (2014), Lee (2020), Hanson et al. (2021), and Bond et al. (2022), along with JMP et al.'s 60-day comments on the USFWS proposal to list the CA subpopulation of the spotted owl under the ESA, which together clearly establish that mechanical thinning and snag-forest logging severely harm spotted owl populations, while wildland fires do not, in the absence of post-fire logging. Moreover, thinning, post-fire logging and other tree removal activities do not reduce severity in wildfires in mesic or dry forests, based on the Forest Service's own science. As discussed in detail below, thinning and other logging (1) increases overall tree mortality, (2) increases rates of wildfire spread, often toward communities, and (3) dramatically increases carbon emissions per unit area relative to fire alone.

In dry forests of the western U.S., even modest "thinning" operations emit 3 times more CO₂ into the atmosphere per acre than does wildfire alone, even if the assumption is made that thinning will curb wildfire intensity (Campbell et al. 2012). Even in the largest and most intense wildfires in dry forest ecosystems, only 1.2% of tree carbon is actually consumed and emitted (Harmon et al. 2022), which is far less carbon removal than even the lightest thinning of smaller trees. Typical mechanical thinning projects remove most, and sometimes nearly all, of the smaller trees up to the specified diameter limit. The question, then, is this: what portion of the forest carbon is removed from the ecosystem in mature and old-growth dry forests if individual mature and old-growth trees over 80 years old are retained, but most or nearly all of the smaller trees—those less than 80 years old—are removed? Based on the findings of Mildrexler et al. (2023), while 42% of the aboveground forest carbon is found in trees larger than 21 inches in diameter in dry forests, 58% is comprised of trees less than 21 inches in diameter. Therefore, in a fairly common mechanical thinning operation, where the great majority of the trees up to the diameter limit are removed, that majority of the aboveground forest carbon could be removed, even if individual mature and old-growth trees over 80 years old (trees that are approximately 20 to 22 inches in diameter and larger) are protected and retained. What does this mean from a carbon emissions standpoint? Based on the analysis in Ingerson (2007), less than one-fifth of the carbon in trees removed from forests through logging ends up in a wood product like dimensional lumber—the remainder ends up in the atmosphere almost immediately, mostly burned for dirty energy in biomass facilities or as hog fuel at lumber mills (e.g., branches, tree tops, bark, round parts, mill residues).

(from Ingerson 2007)

What about the effect of mechanical thinning on wildfire severity in dry forests? The Forest Service's own scientists (Lesmeister et al. 2021) recently conducted a massive, landmark 30-year study in the NWFP area—a substantial portion of which was conducted in dry forests—and found that, in these dry forest types (most frequent fire regime), the densest forests with the highest biomass, highest canopy cover, and highest tree densities, on average had lower wildfire severities when fires occurred when compared to more open, lower-density forests resulting from mechanical thinning and other logging operations (see Figure 4b from Lesmeister et al. 2021 below). The same finding was reported for more mesic forests. The Forest Service scientists concluded that more open forests with lower biomass had higher fire severity, because the type of open, lower-biomass forests resulting from thinning and other logging activities have "hotter, drier, and windier microclimates, and those conditions decrease dramatically over relatively short distances into the interior of older forests with multi-layer canopies and high tree density..."

(from Figure 4 of Lesmeister et al. 2021)

Other Forest Service scientists, in Lydersen et al. (2014), reported the following finding in the 257,000-acre Rim fire of 2013:

"Density of small to intermediate size trees (20-40 cm dbh in the analysis with all plots and both 40-60 cm and 60-80 cm dbh in the analysis excluding plots burned on a plume-dominated day) were also related to Rim Fire severity, with plots with a greater small tree density tending to burn with lower severity."

The very largest scientific analysis ever conducted in dry forests on the subject of tree removal and wildfire severity, Bradley et al. (2016), found that forests completely protected from tree removal had the lowest fire severity, while forests with some limited tree removal allowed had higher levels of fire severity, and forests with the fewest environmental protections and the most tree removal had the highest fire severity. The authors concluded the following:

"We found forests with higher levels of protection [from tree removal] had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading. Our results suggest a need to reconsider current overly simplistic assumptions about the relationship between forest protection and fire severity in fire management and policy."

Hanson (2021) made similar findings in dry forests in the approximately 380,000-acre Creek fire of 2020 in the southern Sierra Nevada, reporting that, based on the Forest Service's own data, forests with previous logging under the rubric of "fuel reduction"—specifically, mechanical thinning and post-fire logging—had overall higher fire severity than unmanaged forests.

More recently, scientists have begun looking at another key question regarding mechanical thinning and wildfire severity in dry forests, related to overall combined tree mortality from thinning itself and subsequent wildfire.

These studies have consistently found that mechanical thinning kills more trees than it prevents from being killed in mature and old dry forests, including Hanson (2022) (pertaining to the Antelope fire of 2021 in northern California), Baker and Hanson (2022) (pertaining to the Caldor fire of 2021 in the northern Sierra Nevada), and DellaSala et al. (2022) (pertaining to the Wallow fire of 2011 in Arizona). Baker and Hanson (2022) explained why some studies have erroneously reported that mechanical thinning is effective as a wildfire management approach:

"Despite controversy regarding thinning, there is a body of scientific literature that suggests commercial thinning should be scaled up across western US forest landscapes as a wildfire management strategy. This raises an important question: what accounts for the discrepancy on this issue in the scientific literature? We believe several factors are likely to largely explain this discrepancy. First and foremost, because most previous research has not

accounted for tree mortality from thinning itself, prior to the wildfire-related mortality, such research has underreported tree mortality in commercial thinning areas relative to unthinned forests. Second, some prior studies have not controlled for vegetation type, which can lead to a mismatch when comparing severity in thinned areas to the rest of the fire area given that thinning necessarily occurs in conifer forests but unthinned areas can include large expanses of non-conifer vegetation types that burn almost exclusively at high severity, such as grasslands and chaparral. Third, some research reporting effectiveness of commercial thinning in terms of reducing fire severity has been based on the subjective location of comparison sample points between thinned and adjacent unthinned forests. Fourth, reported results have often been based on theoretical models, which subsequent research has found to overestimate the effectiveness of thinning. Last, several case studies draw conclusions about the effectiveness of thinning as a wildfire management strategy when the results of those studies do not support such a conclusion, as reviewed in DellaSala et al. (2022)." (internal citations omitted) Based on the foregoing, we urge you to halt logging, including thinning and post-fire logging, in mature and old-growth forests of the NWFP, in both dry and mesic forest types.

Finally, with regard to the common misconception that mature and old-growth stands in dry forests of the NWFP are "overgrown", and have too many smaller trees relative to historical forests, Baker et al. (2023) meticulously documented the fact that this notion stems from a pattern of scientific omissions in studies funded by the Forest Service. This pattern of omissions of peer-reviewed, published reply articles, which refuted and discredited U.S. Forest Service response articles, created a "falsification" of the scientific record regarding historical forest density and fire regimes. The corrected record shows that historical forests were much denser on average than assumed by the Forest Service and were shaped by mixed-severity fire, not merely low-severity fire.

Below we summarize a large and growing body of scientific evidence and opinion concludes that commercial thinning and post-fire logging/clearcutting makes wildfires spread faster and/or burn more severely:

Morris, W.G. (U.S. Forest Service). 1940. Fire weather on clearcut, partly cut, and virgin timber areas at Westfir, Oregon. *Timberman* 42: 20-28.

"This study is concerned with one of these factors - the fire-weather conditions near ground level - on a single operation during the first summer following logging. These conditions were found to be more severe in the clear-cut area than in either the heavy or light partial cutting areas and more severe in the latter areas than in virgin timber."

Countryman, C.M. (U.S. Forest Service). 1956. Old-growth conversion also converts fire climate. *Fire Control Notes* 17: 15-19.

Partial cutting (thinning) increases wildfire severity, due to microclimate impacts, regardless of whether or how the slash debris is treated.

"Although the general relations between weather factors, fuel moisture, and fire behavior are fairly well known, the importance of these changes following conversion and their combined effect on fire behavior and control is not generally recognized. The term 'fireclimate,' as used here, designates the environmental conditions of weather and fuel moisture that affect fire behavior. It does not consider fuel created by slash because regardless of what forest managers do with slash, they still have to deal with the new fireclimate. In fact, the changes in wind, temperature, humidity, air structure, and fuel moisture may result in greater changes in fire behavior and size of control job than does the addition of more fuel in the form of slash."

"Conversion which opens up the canopy by removal of trees permits freer air movement and more sunlight to reach the ground. The increased solar radiation in turn results in higher temperatures, lower humidity, and lower fuel moisture. The magnitude of these changes can be illustrated by comparing the fireclimate in the open with that in a dense stand."

"A mature, closed stand has a fireclimate strikingly different from that in the open. Here nearly all of the solar

radiation is intercepted by the crowns. Some is reflected back to space and the rest is converted to heat and distributed in depth through the crowns. Air within the stand is warmed by contact with the crowns, and the ground fuels are in turn warmed only by contact with the air. The temperature of fuels on the ground thus usually approximates air temperature within the stand."

"Temperature profiles in a dense, mixed conifer stand illustrate this process (fig. 2). By 8 o'clock in the morning, air within the crowns had warmed to 68° F. Air temperature near the ground was only 50°. By 10 o'clock temperatures within the crowns had reached 82° and, although the heat had penetrated to lower levels, air near the surface at 77° was still cooler than at any other level. At 2:00 p.m., air temperature within the stand had become virtually uniform at 87°. In the open less than one-half mile away, however, the temperature at the surface of pine litter reached 153° at 2:00 p.m."

"Because of the lower temperature and higher humidity, fuels within the closed stand are more moist than those in the open under ordinary weather conditions. Typically, when moisture content is 3 percent in the open, 8 percent can be expected in the stand."

"Moisture and temperature differences between open and closed stands have a great effect on both the inception and the behavior of fire. For example, fine fuel at 8-percent moisture content will require nearly one-third more heat for ignition than will the same fuel at 3-percent moisture content. Thus, firebrands that do not contain enough heat to start a fire in a closed stand may readily start one in the open."

"When a standard fire weather station in the open indicates a temperature of 85° F., fuel moisture of 4 percent, and a wind velocity of 15 m.p.h.--not unusual burning conditions in the West--a fire starting on a moderate slope will spread 4.5 times as fast in the open as in a closed stand. The size of the suppression job, however, increases even more drastically."

"Greater rate of spread and intensity of burning require control lines farther from the actual fire, increasing the length of fireline. Line width also must be increased to contain the hotter fire. Less production per man and delays in getting additional crews complicate the control problem on a fast-moving fire. It has been estimated that the size of the suppression job increases nearly as the square of the rate of forward spread. Thus, fire in the open will require 20 times more suppression effort. In other words, for each man required to control a surface fire in a mature stand burning under these conditions, 20 men will be required if the area is clear cut."

"Methods other than clear cutting, of course, may bring a less drastic change in fireclimate. Nevertheless, the change resulting from partial cutting can have important effects on fire. The moderating effect that a dense stand has on the fireclimate usually results in slow-burning fires. Ordinarily, in dense timber only a few days a year have the extreme burning conditions under which surface fires produce heat rapidly enough to carry the fire into the crowns. Partial cutting can increase the severity of the fireclimate enough to materially increase the number of days when disastrous crown fires can occur."

SNEP (co-authored by U.S. Forest Service). 1996. Sierra Nevada Ecosystem Project, Final Report to Congress: Status of the Sierra Nevada. Vol. I: Assessment summaries and management strategies. Davis, CA: University of California, Davis, Center for Water and Wildland Resources.

"Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has increased fire severity more than any other recent human activity."

Beschta, R.L.; Frissell, C.A.; Gresswell, R.; Hauer, R.; Karr, J.R.; Minshall, G.W.; Perry, D.A.; Rhodes, J.J. 1995. Wildfire and salvage logging. Eugene, OR: Pacific Rivers Council.

"We also need to accept that in many drier forest types throughout the region, forest management may have set the stage for fires larger and more intense than have occurred in at least the last few hundred years."

"With respect to the need for management treatments after fires, there is generally no need for urgency, nor is there a universal, ecologically-based need to act at all. By acting quickly, we run the risk of creating new problems before we solve the old ones."

"[S]ome argue that salvage logging is needed because of the perceived increased likelihood that an area may reburn. It is the fine fuels that carry fire, not the large dead woody material. We are aware of no evidence supporting the contention that leaving large dead woody material significantly increases the probability of reburn."

Chen, J., et al. (co-authored by U.S. Forest Service). 1999. Microclimate in forest ecosystem and landscape ecology: Variations in local climate can be used to monitor and compare the effects of different management regimes. *BioScience* 49: 288-297.

When moving from open forest areas, resulting from logging, and into dense forests with high canopy cover, "there is generally a decrease in daytime summer temperatures but an increase in humidity..."

The authors reported a 5° C difference in ambient air temperature between a closed-canopy mature forest and a forest with partial cutting, like a commercial thinning unit (Fig. 4b), and noted that such differences are even greater than the increases in temperature predicted due to anthropogenic climate change.

Dombeck, M. (U.S. Forest Service Chief). 2001. How Can We Reduce the Fire Danger in the Interior West. *Fire Management Today* 61: 5-13.

"Some argue that more commercial timber harvest is needed to remove small-diameter trees and brush that are fueling our worst wildlands fires in the interior West. However, small-diameter trees and brush typically have little or no commercial value. To offset losses from their removal, a commercial operator would have to remove large, merchantable trees in the overstory. Overstory removal lets more light reach the forest floor, promoting vigorous forest regeneration. Where the overstory has been entirely removed, regeneration produces thickets of 2,000 to 10,000 small trees per acre, precisely the small-diameter materials that are causing our worst fire problems. In fact, many large fires in 2000 burned in previously logged areas laced with roads. It seems unlikely that commercial timber harvest can solve our forest health problems."

Morrison, P.H. and K.J. Harma. 2002. Analysis of Land Ownership and Prior Land Management Activities Within the Rodeo & Chediski Fires, Arizona. Pacific Biodiversity Institute, Winthrop, WA. 13 pp.

Previous logging was associated with higher fire severity.

Donato DC, Fontaine JB, Campbell JL, Robinson WD, Kauffman JB, Law BE. 2006. *Science* 311: 352.

"In terms of short-term fire risk, a reburn in [postfire] logged stands would likely exhibit elevated rates of fire spread, fireline intensity, and soil heating impacts...Postfire logging alone was notably incongruent with fuel reduction goals."

Hanson, C.T., Odion, D.C. 2006. Fire Severity in mechanically thinned versus unthinned forests of the Sierra Nevada, California. In: Proceedings of the 3rd International Fire Ecology and Management Congress, November 13-17, 2006, San Diego, CA.

"In all seven sites, combined mortality [thinning and fire] was higher in thinned than in unthinned units. In six of seven sites, fire-induced mortality was higher in thinned than in unthinned units...Mechanical thinning increased fire severity on the sites currently available for study on national forests of the Sierra Nevada."

Platt, R.V., et al. 2006. Are wildfire mitigation and restoration of historic forest structure compatible? A spatial modeling assessment. *Annals of the Assoc. Amer. Geographers* 96: 455-470.

"Compared with the original conditions, a closed canopy would result in a 10 percent reduction in the area of high or extreme fireline intensity. In contrast, an open canopy [from thinning] has the opposite effect, increasing the area exposed to high or extreme fireline intensity by 36 percent. Though it may appear counterintuitive, when all else is equal open canopies lead to reduced fuel moisture and increased midflame windspeed, which increase potential fireline intensity."

Thompson, J.R., Spies, T.A., Ganio, L.M. (co-authored by U.S. Forest Service). 2007. Reburn severity in managed and unmanaged vegetation in a large wildfire. *Proceedings of the National Academy of Sciences of the United States of America* 104: 10743-10748.

"Areas that were salvage-logged and planted after the initial fire burned more severely than comparable unmanaged areas."

Cruz, M.G. and M.E. Alexander. 2010. Assessing crown fire potential in coniferous forests of western North America: A critique of current approaches and recent simulation studies. *Int. J. Wildl. Fire*. 19: 377-398.

The fire models used by the U.S. Forest Service falsely predict effective reduction in crown fire potential from thinning:

"Simulation studies that use certain fire modelling systems (i.e. NEXUS, FlamMap, FARSITE, FFE-FVS (Fire and Fuels Extension to the Forest Vegetation Simulator), Fuel Management Analyst (FMAPlus), BehavePlus) based on separate implementations or direct integration of Rothermel's surface and crown rate of fire spread models with Van Wagner's crown fire transition and propagation models are shown to have a significant underprediction bias when used in assessing potential crown fire behaviour in conifer forests of western North America. The principal sources of this underprediction bias are shown to include: (i) incompatible model linkages; (ii) use of surface and crown fire rate of spread models that have an inherent underprediction bias; and (iii) reduction in crown fire rate of spread based on the use of unsubstantiated crown fraction burned functions. The use of uncalibrated custom fuel models to represent surface fuelbeds is a fourth potential source of bias."

Thompson, J., and T.A. Spies (co-authored by U.S. Forest Service). 2010. Exploring Patterns of Burn Severity in the Biscuit Fire in Southwestern Oregon. *Fire Science Brief* 88: 1-6.

"Areas that burned with high severity...in a previous wildfire (in 1987, 15 years prior) were more likely to burn with high severity again in the 2002 Biscuit Fire. Areas that were salvage-logged and planted following the 1987 fire burned with somewhat higher fire severity than equivalent areas that had not been logged and planted."

Graham, R., et al. (U.S. Forest Service). 2012. Fourmile Canyon Fire Findings. Gen. Tech. Rep. RMRS-GTR-289. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 110 p.

Thinned forests "were burned more severely than neighboring areas where the fuels were not treated", and 162 homes were destroyed by the Fourmile Canyon Fire (see Figs. 45 and 46).

DellaSala et al. (2013) (letter from over 200 scientists):

"Numerous studies also document the cumulative impacts of post-fire logging on natural ecosystems, including...accumulation of logging slash that can add to future fire risks..."

DellaSala et al. (2015) (letter from over 200 scientists):

"Post-fire logging has been shown to eliminate habitat for many bird species that depend on snags, compact soils, remove biological legacies (snags and downed logs) that are essential in supporting new forest growth, and spread invasive species that outcompete native vegetation and, in some cases, increase the flammability of the new forest. While it is often claimed that such logging is needed to restore conifer growth and lower fuel hazards after a fire, many studies have shown that logging tractors often kill most conifer seedlings and other important re-establishing vegetation and actually increases flammable logging slash left on site. Increased chronic sedimentation to streams due to the extensive road network and runoff from logging on steep slopes degrades aquatic organisms and water quality."

North, M.P., S.L. Stephens, B.M. Collins, J.K. Agee, G. Aplet, J.F. Franklin, and P.Z. Fule (co-authored by U.S. Forest Service). 2015. Reform forest fire management. *Science* 349: 1280-1281.

"...fire is usually more efficient, cost-effective, and ecologically beneficial than mechanical treatments."

Bradley, C.M. C.T. Hanson, and D.A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western USA? *Ecosphere* 7: article e01492.

In the largest study on this subject ever conducted in western North American, the authors found that the more trees that are removed from forests through logging, the higher the fire severity overall:

"We investigated the relationship between protected status and fire severity using the Random Forests algorithm applied to 1500 fires affecting 9.5 million hectares between 1984 and 2014 in pine (*Pinus ponderosa*, *Pinus jeffreyi*) and mixed-conifer forests of western United States, accounting for key topographic and climate variables. We found forests with higher levels of protection [from logging] had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading."

Lesmeister, D.B., et al. (co-authored by U.S. Forest Service). 2019. Mixed-severity wildfire and habitat of an old-forest obligate. *Ecosphere* 10: Article e02696.

Denser, older forests with high canopy cover had lower fire severity.

Dunn, C.J., et al. 2020. How does tree regeneration respond to mixed-severity fire in the western Oregon Cascades, USA? *Ecosphere* 11: Article e03003.

Forests that burned at high-severity had lower, not higher, overall pre-fire tree densities.

Meigs, G.W., et al. (co-authored by U.S. Forest Service). 2020. Influence of topography and fuels on fire refugia probability under varying fire weather in forests of the US Pacific Northwest. *Canadian Journal of Forest Research* 50: 636-647.

Forests with higher pre-fire biomass are more likely to experience low-severity fire.

Moomaw et al. (2020) (letter from over 200 scientists: <https://johnmuirproject.org/2020/05/breaking-news-over-200-top-u-s-climate-and-forest-scientists-urge-congress-protect-forests-to-mitigate-climate-crisis/>):

"Troublingly, to make thinning operations economically attractive to logging companies, commercial logging of larger, more fire-resistant trees often occurs across large areas. Importantly, mechanical thinning results in a substantial net loss of forest carbon storage, and a net increase in carbon emissions that can substantially exceed those of wildfire emissions (Hudiburg et al. 2013, Campbell et al. 2012). Reduced forest protections and increased logging tend to make wildland fires burn more intensely (Bradley et al. 2016). This can also occur with commercial thinning, where mature trees are removed (Cruz et al. 2008, Cruz et al. 2014). As an example, logging in U.S. forests emits 10 times more carbon than fire and native insects combined (Harris et al. 2016). And, unlike logging, fire cycles nutrients and helps increase new forest growth."

Moomaw et al. (2021) (letter from over 200 scientists: <https://bit.ly/3BFtlAg>):

"[C]ommercial logging conducted under the guise of 'thinning' and 'fuel reduction' typically removes mature, fire-resistant trees that are needed for forest resilience. We have watched as one large wildfire after another has swept through tens of thousands of acres where commercial thinning had previously occurred due to extreme fire weather driven by climate change. Removing trees can alter a forest's microclimate, and can often increase fire intensity. In contrast, forests protected from logging, and those with high carbon biomass and carbon storage, more often burn at equal or lower intensities when fires do occur."

Lesmeister, D.B., et al. (co-authored by U.S. Forest Service). 2021. Northern spotted owl nesting forests as fire refugia: a 30-year synthesis of large wildfires. *Fire Ecology* 17: Article 32.

More open forests with lower biomass had higher fire severity, because the type of open, lower-biomass forests resulting from thinning and other logging activities have "hotter, drier, and windier microclimates, and those conditions decrease dramatically over relatively short distances into the interior of older forests with multi-layer canopies and high tree density..."

Hanson, C.T. 2021. Is "Fuel Reduction" Justified as Fire Management in Spotted Owl Habitat? *Birds* 2: 395-403.

Thinning followed by burning and post-fire logged areas had higher overall fire severity.

"Within the forest types inhabited by California Spotted Owls, high-severity fire occurrence was not higher overall in unmanaged forests and was not associated with the density of pre-fire snags from recent drought in the Creek Fire, contrary to expectations under the fuel reduction hypothesis. Moreover, fuel-reduction logging in California Spotted Owl habitats was associated with higher fire severity in most cases. The highest levels of high-severity fire were in the categories with commercial logging (post-fire logging, private commercial timberlands, and commercial thinning), while the three categories with lower levels of high-severity fire were in forests with no recent forest management or wildfire, less intensive noncommercial management, and unmanaged forests with re-burning of mixed-severity wildfire, respectively."

Hanson, C.T. 2022. Cumulative severity of thinned and unthinned forests in a large California wildfire. *Land* 11: Article 373.

Thinning followed by burning increases overall fire severity.

"Using published data regarding the percent basal area mortality for each commercial thinning unit that burned in the Antelope fire, combined with percent basal area mortality due to the fire itself from post-fire satellite imagery, it was found that commercial thinning was associated with significantly higher overall tree mortality levels (cumulative severity)."

Baker, B.C., and C.T. Hanson. 2022. Cumulative tree mortality from commercial thinning and a large wildfire in the Sierra Nevada, California. *Land* 11: Article 995.

Thinning followed by burning increases overall fire severity.

"Similar to the findings of Hanson (2022) in the Antelope Fire of 2021 in northern California, in our investigation of the Caldor Fire of 2021 we found significantly higher cumulative severity in forests with commercial thinning than in unthinned forests, indicating that commercial thinning killed significantly more trees than it prevented from being killed in the Caldor Fire...Despite controversy regarding thinning, there is a body of scientific literature that suggests commercial thinning should be scaled up across western US forest landscapes as a wildfire management strategy. This raises an important question: what accounts for the discrepancy on this issue in the scientific literature? We believe several factors are likely to largely explain this discrepancy. First and foremost, because most previous research has not accounted for tree mortality from thinning itself, prior to the wildfire-related mortality, such research has underreported tree mortality in commercial thinning areas relative to unthinned forests. Second, some prior studies have not controlled for vegetation type, which can lead to a mismatch when comparing severity in thinned areas to the rest of the fire area given that thinning necessarily

occurs in conifer forests but unthinned areas can include large expanses of non-conifer vegetation types that burn almost exclusively at high severity, such as grasslands and chaparral. Third, some research reporting effectiveness of commercial thinning in terms of reducing fire severity has been based on the subjective location of comparison sample points between thinned and adjacent unthinned forests. Fourth, reported results have often been based on theoretical models, which subsequent research has found to overestimate the effectiveness of thinning. Last, several case studies draw conclusions about the effectiveness of thinning as a wildfire management strategy when the results of those studies do not support such a conclusion, as reviewed in DellaSala et al. (2022)." (internal citations omitted)

DellaSala, D.A., B.C. Baker, C.T. Hanson, L. Ruediger, and W.L. Baker. 2022. Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus? *Biological Conservation* 268: Article 109499.

Thinning followed by burning increases overall fire severity.

With regard to a previous U.S. Forest Service study claiming that commercial thinning effectively reduced fire severity in the large Wallow fire of 2011 in Arizona, DellaSala et al. (2022, Section 5.1) conducted a detailed accuracy check and found that the previous analysis had dramatically underreported high-severity fire in commercial thinning units, and forests with commercial thinning in fact had higher fire severity, overall.

DellaSala et al. (2022, Section 5.2) also reviewed several U.S. Forest Service studies relied upon by Prichard et al. (2021) for the claim that commercial thinning is an effective fire management approach and found that the actual results of these cited studies did not support that conclusion.

Bartowitz, K.J., et al. 2022. Forest Carbon Emission Sources Are Not Equal: Putting Fire, Harvest, and Fossil Fuel Emissions in Context. *Front. For. Glob. Change* 5: Article 867112.

The authors found that logging conducted as commercial thinning, which involves removal of some mature trees, substantially increases carbon emissions relative to wildfire alone, and commercial thinning "causes a higher rate of tree mortality than wildfire."

Evers, C., et al. 2022. Extreme Winds Alter Influence of Fuels and Topography on Megafire Burn Severity in Seasonal Temperate Rainforests under Record Fuel Aridity. *Fire* 5: Article 41.

The authors found that dense, mature/old forests with high biomass and canopy cover tended to have lower fire severity, while more open forests with lower canopy cover and less biomass burned more severely.

USFS (U.S. Forest Service) (2022). Gallinas-Las Dispensas Prescribed Fire Declared Wildfire Review. U.S. Forest Service, Office of the Chief, Washington, D.C.

Thinning followed by burning caused a massive fire that destroyed communities.

The thinning reduced canopy cover and increased growth of combustible grasses, then the pile burning caused a huge wildfire that spread rapidly through the thinned forests before destroying many homes.

Baker, W.L., C.T. Hanson, M.A. Williams, and D.A. DellaSala. 2023. Countering Omitted Evidence of Variable Historical Forests and Fire Regime in Western USA Dry Forests: The Low-Severity-Fire Model Rejected. *Fire* 6: Article 146.

A pattern of omissions of peer-reviewed, published reply articles, which refuted and discredited U.S. Forest Service response articles, created a "falsification" of the scientific record regarding historical forest density and fire regimes. The corrected record shows that historical forests were much denser on average than assumed by

the Forest Service and were shaped by mixed-severity fire, not merely low-severity fire.

The only effective way to protect homes from fire is home-hardening and defensible space pruning within 100 to 200 feet of homes or less.

Cohen, J.D. (U.S. Forest Service). 2000. Preventing disaster: home ignitability in the wildland-urban interface. *Journal of Forestry* 98: 15-21.

The only relevant zone to protect homes from wildland fire is within approximately 135 feet or less from each home-not out in wildland forests.

Gibbons P, van Bommel L, Gill MA, Cary GJ, Driscoll DA, Bradstock RA, Knight E, Moritz MA, Stephens SL, Lindenmayer DB (2012) Land management practices associated with house loss in wildfires. *PLoS ONE* 7: Article e29212.

Defensible space pruning within less than 130 feet from homes was effective at protecting homes from wildfires, while vegetation management in remote wildlands was not. A modest additional benefit for home safety was provided by prescribed burning less than 500 meters (less than 1641 feet) from homes.

Syphard, A.D., T.J. Brennan, and J.E. Keeley. 2014. The role of defensible space for residential structure protection during wildfires. *Intl. J. Wildland Fire* 23: 1165-1175.

Vegetation management and removal beyond approximately 100 feet from homes provides no additional benefit in terms of protecting homes from wildfires.

Tree removal is not necessary prior to conducting prescribed fire as an additional community safety buffer.

Decades of scientific studies have proven that, even in the densest forests that have not experienced fire in many decades, prescribed fire can be applied without prior tree removal, as demonstrated in the following studies:

Knapp EE, Keeley JE, Ballenger EA, Brennan TJ. 2005. Fuel reduction and coarse woody debris dynamics with early season and late season prescribed fire in a Sierra Nevada mixed conifer forest. *Forest Ecology and Management* 208: 383-397.

Knapp, E.E., and Keeley, J.E. 2006. Heterogeneity in fire severity within early season and late season prescribed burns in a mixed-conifer forest. *Int. J. Wildland Fire* 15: 37-45.

Knapp, E.E., Schwilk, D.W., Kane, J.M., Keeley, J.E., 2007. Role of burning on initial understory vegetation response to prescribed fire in a mixed conifer forest. *Canadian Journal of Forest Research* 37: 11-22.

van Mantgem, P.J., A.C. Caprio, N.L. Stephenson, and A.J. Das. 2016. Does prescribed fire promote resistance to drought in low elevation forests of the Sierra Nevada, California, USA? *Fire Ecology* 12: 13-25.

van Mantgem, P.J., N.L. Stephenson, J.J. Battles, E.K. Knapp, and J.E. Keeley. 2011. Long-term effects of prescribed fire on mixed conifer forest structure in the Sierra Nevada, California. *Forest Ecology and Management* 261: 989-994.

Sincerely,

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