Data Submitted (UTC 11): 2/7/2020 10:30:43 PM
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Title: Executive Director
Comments: Eli Ilano, Forest Supervisor
Laurie Perrot, Environmental Coordinator
Tahoe National Forest
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RE: Scoping comments on Tahoe National Forest Plan Amendment: Managing Naturally Ignited Wildfire for Resource Benefits

Dear Supervisor Ilano and Coordinator Perrot,

Thank you for the opportunity to provide comment on the Proposed Amendment to the Tahoe National Forest Land and Resource Management Plan (Forest Plan 1990). We hold that low-to-medium intensity frequent fire is an essential process of the mixed-conifer ecosystem that makes up so much of the Tahoe NF and that the last century of fire suppression has had ecologically detrimental and socially hazardous consequences on much of the Sierra Nevada (Collins et. al, 2018). Thus, it is our belief the proposed amendment would provide the essential tool of managing naturally ignited fire to land managers to promote multiple resource benefits to the Tahoe NF and its associated watersheds as well as address public health and safety concerns.

We write to you on behalf of the South Yuba River Citizens League. Through careful examination of the best available science, consideration of local environmental history, and collaboration between organizations, we are working to improve and restore forest health and resilience on the watershed scale. Our combined research and experiences support our understanding that forests need multiple and flexible management options in order to address the years-worth of fuel build-up and susceptibility to disease and mega-fires resulting from a combination of fire suppression and climatic stressors (Stephens et. al, 2015). Thinning operations and prescribed burning, although effective fuel-reduction management techniques when feasible, cannot alone tackle the sheer amount of fuels present in our forests (Stephens et. al, 2012). That is why we support the Proposed Amendment to the Forest Plan; land managers must have the opportunity to manage naturally ignited fires when conditions allow in effort to improve forest resilience, better watershed health and function, and defend public health and safety, not only to meet current needs, but also to manage for coming generations.

As a founding member and MOU-signatory of the North Yuba Forest Partnership, the South Yuba River Citizens League is working collaboratively at an unprecedented scale to plan, analyze, finance, and implement forest restoration across 275,000 acres of the North Yuba River watershed, including 210,000 acres of TNF. The Partnership is working together to carry out ecological thinning and prescribed fire, emphasizing the key ecological role that low-to-moderate intensity fire provides. The forest restoration projects carried out by the Partnership in combination with managed natural ignitions will improve future fire effects and overall ecosystem health.

To further support our stance and the Proposed Amendment, we point to the successes of the Inyo NF management of the Springs Fire (2019), a lightning ignited fire. With the use of a decision matrix, multiple social and ecological objectives were met, costs were kept low, and the Inyo NF received pubic support for their management decision. Additionally, the Inyo NF recognizes use of a Type 3 Management Organization kept

costs low by utilizing local knowledge and resources. There is no doubt that conditions aligned so that managing the Springs Fire was possible, i.e., timing, weather, and topography, of which are all driving forces on fire behavior. Nonetheless, the decision to manage this naturally ignited fire allowed for 4,840 acres of fuel to be burned at mostly low-to-moderate intensity, costing $1,275 per acre ($6,174,292 total). The decision matrix used accounted for public safety, emergency resources, fire behavior factors, and ecological objectives to inform decision making. Use of this matrix by the Inyo NF is an example of how multiple objectives, such as protecting the wildland-urban interface, reducing fuels at an increased scale, and restoring fire as a natural process to the landscape can be met when managed lighting fire is an available tool to land managers.

For the reasons outlined in the Proposed Amendment and the example of the Springs Fire, we voice our support of the Proposed Amendment. The US Forest Service mission is "to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations". In order to accomplish your mission, land managers need to have every tool available to them for appropriate and sustainable management decisions.

Sincerely,

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References

Collins, B. M., R. G. Everett, and S. L. Stephens. 2011. Impacts of fire exclusion and recent managed fire on forest structure in old growth Sierra Nevada mixed-conifer forests. Ecosphere 2(4):art51. doi:10.1890/ES11-00026.1

Stephens, S. L.; Collins, B. M.; Roller, G. 2012. Fuel treatment longevity in a Sierra Nevada mixed conifer forest. Forest Ecology and Management 285: 204-212.

Stephens, S. L., J. M. Lydersen, B. M. Collins, D. L. Fry, and M. D. Meyer. 2015. Historical and current landscape-scale ponderosa pine and mixed conifer forest structure in the Southern Sierra Nevada. Ecosphere 6(5):79. http://dx.doi.org/10.1890/ES14-00379.1