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Comments: Please accept this letter as a formal comment on the Preliminary Environmental Assessment for a post-fire project in the area affected by the August Complex fire.

For context, I am a climate physicist at Brown University. Though I live in Rhode Island, I am a native of California and have made many long-term visits to the Klamath Mountain region, and have also worked on several (USFS approved) volunteer trail projects, including a recent project in the Yolla Bolly - Middle Eel Wilderness. My co-authored paper on "Fire in the Earth System" [Science 324, 481 - 484 (2009)] has been cited over 2,000 times. I attended the March 12 public meeting about the Proposed Action and asked two questions.

The Proposed Action, which purports to restore forest health, fails to end the repeating cycle of burn -> "restore" -> burn that has been accelerating due to the combined effects of forest mismanagement and climate change. It also fails to seriously address the Executive Order on Tackling the Climate Crisis at Home and Abroad issued by President Biden on January 27, 2021 that directs all federal agencies including the Department of Agriculture to make climate change a top priority.

Burn severity maps for the August fire show a striking fact: The Yolla-Bolly Wilderness, which burned widely, for the most part burned less severely than the adjacent managed forests. The resilience of wilderness areas to fire compared to managed forests is typical yet the US Forest Service ignores the obvious lesson. The scoping document speaks of "creating conditions that will support the long-term survival of new forests including the removal of fire-killed and injured trees to limit the long-term accumulation of heavy fuels." None of those activities happen in unmanaged wilderness areas yet these areas generally fare better.

The scoping document also fails to answer the question of whether or not the trees to be planted will match the species and variety of trees killed by the fire. Will the native species be replaced by varieties favored by timber interests?

The scoping document fails to account for the changing climate. "Increase carbon sequestration through reforestation and store more carbon by product removal and utilization" is disingenuous. Once the USFS managed forests burn hot again (and they will) carbon that was removed from the atmosphere will be released back to the air. Indeed, climate change is increasing the likelihood of extreme wildfire events in the autumn when California forests are most at risk. See "Climate change is increasing the likelihood of extreme autumn wildfire conditions in California" by Michael Goss et al., 2020 Environ. Res. Lett. at URL <https://doi.org/10.1088/1748-9326/ab83a7>. Removal and sale of timber will in fact release almost all of the carbon. Very little will be sequestered because only a small fraction of the harvested wood will end up in products. Furthermore, by managing the forest as proposed, the USFS would make it more susceptible to fire ultimately producing the opposite effect of releasing more carbon to the atmosphere. Standing burned forests still retain most of the carbon but upon "restoration" that much of that carbon is released into the atmosphere.

In general, Phase I of the August Fire Restoration Project as described by the February 22 scoping document does not consider the fundamental changes to US Forest Service management that are necessary to restore true forest health. It also violates the President's Executive Order. The USFS has a clear choice: Change, or remain stuck in the 20th century resource extraction mindset and be replaced by a successor agency that will work towards true forest health.