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Comments: Hume Basin Restoration EA comments
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These comments are submitted by the Camp 70 Foresters. We are a group of former forestry classmates and U.C. School of Forestry graduates. Our group comprises mostly retired professional foresters without current ties to industry, environmental or governmental agencies. We have been discussing the Western wildfire problem for over a year. We wrote a consensus position paper in 2022 which can be found at https://californiasaf.org/2022/03/24/western-wildfire-position-paper-camp-70/ . We also reference two recent 2022 policy papers from the California Society of American Foresters: "Sustaining native giant sequoia groves requires active, adaptive management" https://californiasaf.org/2022/10/03/california-saf-giant-sequoia-policy-statement-2022/ and "Forestry Solutions to California's Wildfire Crisis" https://californiasaf.org/2023/01/07/forestry-solutions-to-californias-wildfire-crisis/ .

Our current focus is the protection of giant sequoia groves, including the forests that surround groves. The destruction of almost 20% of specimen giant sequoias in the past few years got our attention. The shocking fuel loading and fire return data in this EA only reinforce the need for urgent action. We support the Sequoia National Forest's efforts to directly protect giant sequoias groves and any meaningful efforts to reduce wildfire severity over NFS lands in general. We offer the following comments.

1.After decades of little or no fuels reduction at an effective scale, we are pleased the Sequoia and Sierra NFs are finally undertaking a program of work, including the Giant Sequoia Emergency Response. The Hume Basin Restoration project is, at first glance, is a good start with admirable goals. A closer look at the project map and the management requirements causes us to question the effectiveness of the treatments at the landscape or watershed level, however.

Although fire modeling showed improvements within the treated areas (stand level) we were unable to find the analysis that demonstrated the amount of reduction in high severity fire at the landscape level (if we missed it, please point it out to us). The project map shows small, scattered treatment units in the southern 2/3s of the project area without information on the fuels condition of the matrix. Is treating these units sufficient to affect fire behavior at the larger scale?

2.The Forest uses the traditional approach of "buffer, flag, and avoid" for many areas including heritage sites, sensitive plant habitat, and riparian areas, as well as using lengthy LOPs and canopy cover requirements that significantly limit flexibility to carry out critical fuel reduction work. After the destruction of the past few years, we hoped to see more tradeoffs for critically needed fuels reduction, including consideration of the potential damage to these special areas during high intensity fire. Jones (2022) points out the impacts to spotted owls, which could apply similarly to fisher, goshawk, or riparian habitat. Pockets of dense fuel burn the hottest. We urge you to use a more active fuels reduction approach, so these areas have a chance to survive when the next fire comes through.

3.Similarly, do strict soil cover and coarse woody debris requirements from the 1990s, as well as other legacy standards still make sense under today's fire threat? We hope the Forest is taking a hard look at tradeoffs and costs. Higher costs mean fewer acres treated. Key point is balancing myriad legacy environmental restrictions against the potential damage from high severity fire.

4.We didn't see any consideration of the actual fire suppression operations in the planning of this project. After

initially functioning as barriers, fires tend to reburn the topography in a similar pattern. Are you proposing decommissioning roads that could be important for future suppression access? If so, is there a way to stabilize those roads and allow for quick opening in an emergency? Did the selection and design of treatment units complement future suppression access (e.g., roads, ridges, natural fuelbreaks, trails, helispots, powerlines)?

5.While it's understandable to focus on areas with <35% slopes, we encourage the Forest to explore new technology such as tethered logging for fuel reduction on steeper slopes and in RCAs. Developing the local skills, equipment, and infrastructure to manage these areas is critical for success in the longer term. If possible, encourage (subsidize?) efforts to utilize biomass.

6.The silvicultural prescriptions are sound but should achieve much more given the real threat from wildfire. For instance, trees over 20" dbh are not allowed to be removed unless you undertake an amendment to the Monument plan. After 20+ years under the plan it is apparent the stated goal of protecting giant sequoias has not been met. Quite the opposite, in fact. The Forest owes the public an honest evaluation and course correction ("adaptive management") after the recent disastrous fire seasons. Continuing the same plan is illogical and risky. The term "illusion of protection" used by Dr. Rob York is descriptive of the Monument plan, as well as avoidance measures discussed in #2 above. A timid approach due to conflict avoidance will ultimately fail to reduce the severity of wildfire effects at the landscape level.

We suggest you use a term other than the outdated jargon "sanitize". Most people misconstrue the meaning in a forest setting. Explain that you are removing current and near future hazard trees.

Pruning is expensive. If possible, try to use light underburning to achieve the same goal. We support herbicide use in research as well as operationally, including invasive plant control.

7.Are the acres in Tables 2 and 3 net acres? If there's overlap, please display differently. Most people don't understand your reporting system and may assume you are double or triple counting.

8.Consider initiating underburning sooner than 5 to 10 years post thinning. John Mount published a low cost, low intensity tree well burning technique he used for decades in the southern Sierra on SCE lands. Monitor burn piles with heavy fuels to prevent reburning in early summer. Make pile burning a priority so they don't contribute to the fuels problem. Promptly dispose pine plantation piles to prevent insect infestation and fire risk.

9.Don't apologize about the rate of return in the economic analysis. With no mill capacity or biomass facility left in the southern Sierra the FS should not be under a mandate to have a positive economic return. You do have a responsibility to use your funding in the most efficient way possible, however (see above).

References:
Megafire Impacts to Spotted Owls." As presented to the Winter Meeting of the California Society of American Foresters, 3/18/22, by Dr. Gavin Jones, Research Ecologist, USDA Forest Service and University of New Mexico, and referencing Jones, Et al. (2016), Frontiers in Ecology and the Environment and (2021) Animal Conservation.