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Comments: I applaud the effort laid out in Land Management Plan Direction For Old-Growth Forest Conditions Across the National Forest System, #65356. I am especially excited to see the clear inclusion of input, when helpfully braided, from Tribal and Indigenous Practices and emphasis on evidence-based science. I am also delighted to see the attention paid to not only preserving current Old Growth Forests but INCREASING identification and support for expanding appropriate spaces/programs committed to result in more old growth forests - including support for current mature forests and designing/planning for this from the "ground" up. I strongly request that land be set aside, tithed back, equivalent to at least 10 percent from all wildfires and prescription burns to become future old growth forest.

The following issues do not seem to be addressed here and I believe need to be - going forward.

1. There is over-compensation currently throughout the USFS on "restoring" fire to the landscape. While this does have some importance, as currently being implemented, it is critically OUT of balance with restoring WATER to the forest. Water cycle regeneration must become the PRIORITY, and all decisions about fire subordinated to it.

In drought and climate change the priority has to be maximizing the science and healthy applications of the biology of rainfall and snowfall to manage drought RATHER misusing fire in a manner that accelerates drought. The latter creates an endless positive feedback loop that worsens forest vulnerability to disease and catastrophic wildfire, followed by more heat, disease and catastrophic fire. There should be no intentional or prescription burns that accelerate loss of snowpack or rain due to fire induced heat and evaporation in a drought prone or threatened area. There should be no intentional burns that could reduce frequency, duration and quantity of precipitation in desert or drought prone areas. Fires should not destroy or deplete moss and other forest floor structure that preserves soil moisture and vegetation moisture. The science needs to be done FIRST to make sure that what intentional burning does occurs does not interfere with precipitation for the forest or the nearby communities. Hot cities deprived of rainfall do not support forests well.

There needs to be serious study of the NEGATIVE role of fire emissions and soot, particularly for intentional fires that go past sundown on interfering with humidity levels and recovery of moisture in leaf litter, vegetation, and the catalyst micro-organisms like pseudomonas syringae that are far better catalysts for rainfall than soot at the temperatures we are living with in most of the US. It is crucial to NOT interfere with these. This needs to be worked out carefully with small and short duration prescription burns BEFORE use of multi day and multi week burns. The latter should be ceased until it is proven that they do not interfere with the dependent water cycles for either the forest or any surrounding communities. If this cannot be proven, change from fire to alternate strategies that best promote the water cycle for any areas threatened by drought.

The USFS admits that 80+ percent of forest fires are human caused. Continue all efforts to reduce this. Require power lines be expeditiously removed from being in or proximity to all USFS land. I am concerned that the risk of wildfire is over-emphasized as being a natural phenomenon, or being needed by the landscape, or drought drive - when it is really human negligence, error, or in some cases frank arson driving most wildfires. The science behind deciding what acres needing to be burned needs to be more publically transparent and open to debate - this should exclude fires that are responsibility of gas/electric company practices and negligence as well as other human caused ignitions. Companies which have a role in this should pay their customers for harm endured AND pay for the forest restoration plus be required to make their technology safe for the surrounding forests and communities. Set the incentives for compliance with best practices - to come out of their profits, not the customers pockets, if they have been contributory source to severity of a wildfire.

Unbiased appropriately qualified engineering specialists without conflict of interest need to re-evaluate the power company practices of skipping the grounding wire in long distance electrical transmission lines that span forests with mega-wattage transmission. The alternating energy process between lines to skip the grounding wire, and all the added equipment/processes to resist rain/precipitation on power lines needs to be re-evaluated for what is in best interest of the forest AND preserving rain and snow fall. This needs to be higher priority than power company convenience. Where they need to put their lines underground, that needs to be required ... particularly regarding being anywhere near old growth/mature forests. No above ground power lines anywhere near them. Probably they should not be underground either in many/most cases unless such lines can be guaranteed for centuries to not explode or need maintenance.

2. Any plans to restore/use fire need to be deferred until first fully adequate monitoring and surveillance is in place to keep air quality of all human inhabited zones at a PM 2.5 particulate level less than 12 and all other emissions safe as well (that will also benefit the animals and wildlife too). This process needs to be in place with dense enough networks of sufficiently accurate monitors to protect human and animal health first! Any fire plans must be done in a manner that they can be quickly downsized to preserve air quality within 1-4 hours, not days. When fires are planned near cities they need to be very small, and short durations because wind and dispersion has been too poorly predictable/controllable to tolerate the overly large acres and number of pile burns being done simultaneously. Don't count on future ventilation. Adequate ventilation needs to be reliably present at the beginning and throughout the intentional fire (including evenings when the air cools and soot sinks) or put those fires out. Don't set fires that cannot be extinguished easily and quickly when the soot and volatile components of forest smoke can reach populated communities.

The cost of increased health risks and treatment is not fair to citizens. It is born multiple times by the taxpayer who pays the forest service to burn and then pays for the consequences to their own health and income (if work or school functioning disturbed by fire/soot) and again pays to subsidize insurance (private and governmental) for health costs. From the very beginning, structure all forest treatments to FIRST DO NO HARM to human health. This is the sacred and essential requirement of prescribing!

Change incentive structures for any forest treatments including intentional fire to emphasize that completion of it and payment MUST be based on accurate and adequate quality assessments which are fully disclosed to the public and which result in no harm to humans (including so-called "sensitive" populations like children, seniors, persons with lung disease, kidney disease, heart disease, etc. ). To get paid for the forest treatments including fire - execution has to be proven to have preserved air quality and not introduced any other health harm.

3. Current USFS budgets appear to have overemphasized an almost militarization approach to forestry - drones, aerial ignitions, helicopter ignitions, and long distance flame throwers - which appear to be intended for large scale prescription burning RATHER than precision. This has NOT been matched by, while it should be vastly exceeded by, networks of scientifically credible air quality monitoring and soil plus vegetation moisture and weather monitoring to make sure the added fire harms neither the precipitation cycle OR the air and water quality. What is most like needed the MAJORITY of the time is small precision fire, not large landscape fire. We do not live in the same spaces as indigenous people who may have done that before. May have been fine before. The planet has changed. The climate has changed. We are living in very different conditions now when we have concrete/asphalt cities heating the atmosphere plus fossil fuels and a drastically depleted Amazon rainforest!

So. Now what needs to be in place first are the quality monitoring, surveillance programs with real-time adjustments in any active forest treatments - tightly coupled with capacity and commitment to scale back burning in real time to preserve air quality and humidity plus precipitation. The temptation to use all the high tech fire-making gear when the air quality and water/precipitation cycles are not stable and secured should be VERY rigorously avoided.

3. The USFS should have no exceptions to EPA standards for air quality, water quality or soil quality and any other pollutants. They should rigorously meet them. Any variance should be publically announced along with commitments they will make to expeditiously correct the problem and safeguards they will institute to avoid exceeding these thresholds on the unfavorable side again. Operations for forest treatments including prescription burning should be halted in the adversely affected region until prevention of future violations is assured. Health professionals in the affected communities should be involved in this planning and correction. Any harm to citizens should be financially compensated in full by the USFS, as well as any property damage. This is necessary so the USFS remains committed to and has incentive to be adequately rigorous about avoiding harm.

4. As a next step, and one that will help USFS accomplish #3 is that the USFS should consistently aim to exceed by doing BETTER than any existing EPA standards in preserving air, water, soil quality and avoiding any pollutants/toxins. The USFS should become THE source for the leading edge of technology and research to accomplish this and incentivize effective significant action in this direction. They should be the leadership model for all other groups including industry. Just as NASA has been a catalyst for development of important technologies utilized in many other industries - USFS should hold this role for technologies and expertise in maximizing the Air Quality, Water quality, and for continuously and progressively minimizing any unhealthy emissions from added fire or other forest treatments. This means that forest treatments should be rigorously evaluated, results communicated regularly in timely fashion to the public and continuously improved with respect to minimizing their effects on carbon and climate consequences pumped into atmosphere during intentional burn operations (ie vegetation burned), carbon released and climate consequences to conduct any of the treatment operations such as fuel (especially aerial operations fuel). There should be full disclosure of the carbon cost burdens of prescription burns that escape confinement, etc.

5. Likewise, the USFS should become THE leaders in understanding and maximizing the water cycle to increase precipitation where needed in drought threatened areas. Water conservation sometimes unfortunately adds MORE heat and more desertification. USFS needs to do the research to learn how best to reliably support and regenerate an abundant water cycle (rain and snow) for drought resilience, as a far more important goal than increasing conservation. This needs to be prioritized markedly more than fire-making for the Western half of the US.