Data Submitted (UTC 11): 2/3/2024 12:43:42 AM
First name: Timothy
Last name: Ingalsbee
Organization: Firefighters United for Safety, Ethics, and Ecology (FUSEE)
Title:
Comments:
To: U.S. Forest Service
From: Firefighters United for Safety, Ethics, and Ecology (FUSEE)
RE: scoping comments for U.S. Forest Service Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System
Date: February 1, 2024

Although most old-growth trees have been liquidated by past logging, remaining stands are being adversely impacted by wildland fire that is burning with uncharacteristic severity. Wildfires are burning with higher intensity and increased severity under the influence of climate change. In wetter forests they are often burning in homogeneous plantations, mixed with isolated blocks of old growth. In mixed conifer and drier forests, many old growth stands have accumulated surface fuels and dense, stagnated understories. This is not just a recipe for more stand-killing wildfires. Ongoing fire suppression relies heavily on high severity backfiring operations, sometimes within old-growth stands, during conditions of extremely low fuel moisture. Clearly, old growth is under threat from high severity fire and from unwise fire policy.

We believe that restoring fire resilience with prescribed fire, cultural burning and ecological fire use can help protect mature and old-growth forests from future high severity fire.

Given trends of climate change and its role in increasing wildfire activity, we see an urgent need to cease reactive fire suppression and to reintroduce prescribed and cultural burning on a large scale. Fire suppression consumes vast amounts of funding and resources devoted to emergency fire suppression. Prescribed fire gets tiny budgets and low personnel ceilings. Agency budgets should be reoriented to proactive controlled burning. Getting more beneficial fire on the ground now will better protect remaining mature and old-growth trees from future climate conditions and wildfire events.

Climate-driven wildfires are impacting even fire-adapted species and habitats. For example, Giant Sequoia stands have been killed by recent fires at unprecedented rates, much of the mortality correlated with uncharacteristic fire behavior burning through excess surface and ladder fuels. We know that in the past decade in California's iconic Sierra mixed conifer, 50% of mature forest habitat and 85% of high-density mature forests have either transitioned to lower density forest or to non-forest vegetation types (Steel, et al., 2022. https://doi.org/10.1002/eap.2763). High severity fire is killing the Sierra mixed conifer old-growth and it is killing Giant Sequoia. Low-severity fire may be the key to saving what remains. We will have the best opportunity for reintroducing low-severity fire if we proactively apply it with prescribed and cultural burning.

We believe specific and ongoing federal appropriations should be applied to identify and under-burn stands adjacent to mature and old growth stands. We see this as necessary to limit overstory mortality in old growth and to build stand resilience to subsequent wildfire. Using managed fire to avert high severity fire is an ancient practice, used for millennia in western forests. We can re-learn how to apply fire on a landscape scale, to protect mature and old growth forests.

We hope that fuel removals around mature stands or from within mature stands do not get mixed up with commercial logging operations. Where commercial timber extraction occurs, it should simply be called logging, not be called "fuels reduction" or "forest restoration." We advocate de-coupling fuels and restoration projects from timber sales. While every timber sale must be following by treatment of logging slash, not every fuels reduction or forest restoration project needs to begin with a timber sale.

As climate change continues, high-intensity wildfires are becoming more frequent. This is putting our forests at risk. We need funding and staffing for putting low severity fire back in the forest. By protecting mature and old-growth trees with low severity fire, we can help to reduce the risk of catastrophic wildfires and build a more resilient future for our forests. We logged billions of board feet out of western forests; a small reinvestment of funds seems fair. We need to protect mature and old growth stands with fire, not from fire.