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Comments: The following are comments from Firefighters United for Safety, Ethics, and Ecology (FUSEE) on the Draft Environmental Impact Statement for Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System.

Firefighter's United for Safety, Ethics, and Ecology (FUSEE) wants to express our strong support for protecting mature and old-growth forests on federal lands. Mature and old-growth (MOG) forests are more fire-resistant and resilient to other natural disturbances than young forests, especially tree plantations. This is especially true in dry forests such as mixed conifer. MOG stands provides critical shade that holds more soil moisture, older trees have thicker bark, and old trees often self-prune until their limbs are above the reach of surface fires. These characteristics make old growth trees less likely to ignite and less likely to be killed by fire (Foster, D.R., et al., 2020; Keeley, J.E., et al, 2015; O'Brien, M., et al., 2020). In the Pacific Northwest, MOG forests also provide suitable nesting forest for the Northern spotted owl. At least one study has shown that under most wildfire conditions, the microclimate of interior patches of suitable owl nesting forests likely mitigated fire severity and thus functioned as fire refugia (Lesmeister, D.B., et al., 2021). Trends suggest MOG forests can dampen the effect of increased wildfire activity and be an important component of fire resilient landscapes.

Today's wildland firefighters often end up working in vast snag patches from recent high severity fires. They may also be working in young even-aged plantations, which are more likely to burn at high severity (Moritz, M.A., et al. 2021). Our members can attest that young plantations can support very high rates of spread, increasing the risk of entrapment. A safer alternative for firefighters may be to manage for forests with a mix of age classes, perhaps long rotations in commercial stands, and a general recognition that fire must be managed, not just suppressed, if MOG stands are to survive the changing climate.

Prescribed fire can help to protect MOG forests from uncharacteristically severe fire (Keane, R.E., et al, 2021). Our members see an urgency to protect remaining MOG trees with prescribed fire and reduction of adjacent surface and ladder fuels. We know that in the past decade in California, 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 adversely impacting mixed conifer MOG, and low-severity fire may be the key to saving what remains.

We believe that MOG protection should take a landscape perspective rather than a stand-level focus, and actions should begin in the majority of the landscape that is not currently MOG, especially tree plantations that are extremely flammable, are prone to catastrophic impacts from even moderate-intensity flames, and greatly increase the risk of spreading high-intensity fire into MOG stands. If extensive logging, thinning, or cutting needs to occur to mitigate wildfire hazards, it is within the tree plantations that this work needs to begin--with utmost urgency--not in MOG. All cutting must then be followed by under-burning stands adjacent to MOG 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 wildfire is an ancient practice, used for millennia in western forests by

Indigenous peoples. We can and should re-learn how to apply fire on a landscape scale to protect MOG forests, and the USFS should be actively working with Tribes to expedite this learning process.

Prescribed underburning with or without pre-burn cutting of small diameter trees, pruning of lower limbs and ladder fuels, and pile burning of this material, may be used in MOG in this race against time to protect ancient trees, provided that these mechanical activities are seen as a specific treatment to set up stands for restoration of a natural fire regime. Prescribed fire can reduce fuel loads and create shaded fuel breaks, which can help to prevent high severity wildfires from spreading to remaining old growth forests. We took billions of board feet out of western forests, a small reinvestment of funds seems fair.

Protecting MOG forests is also important for mitigating climate change. These forests store large amounts of carbon and protecting these forests can help to reduce greenhouse gas emissions. As climate change continues to drive more extreme weather events, wildfires are becoming more frequent and intense. This is putting our forests, wildlife, communities, and wildland firefighters at greater and growing risk. By protecting MOG trees, we can help to reduce the risk of uncharacteristically high-intensity wildfires across a broader landscape, and build a more resilient future for our forests.

In addition to the above general comments, below are comments related to specific topics that need to be analyzed for the Final EIS:

FIRE INCLUSION OFFERS THE ANTIDOTE TO FIRE EXCLUSION

The DEIS correctly identifies that fire exclusion has created a fire deficit that is adversely impacting MOG forest. The recent surge of large-scale wildfires is beginning to compensate for some of the fire deficit but is insufficient and beneficial fire must be encouraged each year into perpetuity if MOG forests and fire-adapted landscapes are to become truly resilient and sustainable over the long-term. The FEIS should expand its discussion and analysis of the three different means of restoring beneficial fire: Indigenous cultural burning, prescribed burning, and wildland fire use a.k.a. "managed wildfire."

ECOLOGICAL FIRE USE FROM "MANAGED WILDFIRE" NEEDS TO BE A TOOL

Given climate change projections, we need to get as much beneficial fire on the ground as soon as possible in order to whittle down the excessive surface fuels that have accumulated from fire exclusion. We will never be able to "increase the pace and scale of treatments" to fully compensate for the fire deficit, and mechanical treatments are no substitute for the many ecological functions and effects of fire. We will never be able to "treat" our way out of the crisis caused by fire exclusion without facilitating fire inclusion from all sources of ignition, including wildfire. According to the Federal Wildland Fire Policy, it is the current and expected conditions of wildland fire along with the given land management plan that should determine wildfire response, not the ignition source or location. We must take every opportunity available to manage for the inclusion of beneficial fire while conditions allow safe fire behavior and desired fire effects. We cannot "protect" MOG from fire, but we can protect MOG forests with fire. The FEIS must include analysis and disclosure of the beneficial effects of

managing wildfire on MOG forest protection.

FIRE SUPPRESSION IMPACTS WITHIN MOG FORESTS NEEDS TO BE ANALYZED

The DEIS has a huge gap in its analysis in terms of analyzing the adverse impacts on MOG forests from conventional fire suppression activities. Standard suppression methods include the use of heavy equipment such as bulldozers and fellerbunchers to cut firelines, the use of chemical retardants from aircraft, and suppression firing operations. In particular, in areas with few roads, steep slopes, dense surface fuels and vegetation, and severe fire weather conditions, firefighters are using more firing operations to attempt wildfire suppression. But igniting these backfires, large-scale burnouts, and "backburns" during hot, dry, windy conditions and especially red flag conditions may be causing high-severity effects in MOG. Given the growing use of suppression firing operations in MOG, we should no longer assume that fire suppression equates with fire exclusion nor MOG is "protected" from wildfire by fire suppression. On the contrary, suppression firing ignitions may be a major threat to MOG. The FEIS needs to analyze and disclose the impacts of conventional fire suppression, especially suppression firing operations, on MOG forests.

ACTIVE FOREST MANAGEMENT HAS BEEN A PROBLEM; ACTIVE FIRE MANAGEMENT IS A SOLUTION

The phrase "active forest management" has historically been used as a euphemism for commodity timber extraction, and the DEIS now proposes to use the phrase "vegetation management" for what appears to be the same old scheme of logging. The DEIS did an insufficient job of disclosing the epic impacts across the continent from past commercial extraction of MOG trees and conversion of MOG forests into tree plantations. These effects are still with us--they are not "past." The many adverse social and ecological impacts of timber extraction cannot be compensated by revving up "active forest management" in the guise of further commercial timber extraction. Although there is an evident need for lots of cutting to prepare forests for burning, and some of this material may have some commercial or resource value, this kind of cutting is qualitatively different from logging. And the intent of cutting in order to facilitate burning is vastly different from logging to perpetuate fire exclusion. The FEIS needs to more fully disclose the lasting impacts on a landscape, even continental scale, of the combined management activities of logging and firefighting (or timber extraction and fire suppression), and make a stronger case for understory cutting and burning in a philosophy of active fire/fuels management.

MOG PROTECTION MUST BE LED BY TRIBAL INCLUSION AND INDIGENOUS FIRE STEWARDSHIP STRATEGIES

The DEIS offers a few favorable passages acknowledging Indigenous fire stewardship and traditional ecological knowledge, but should more fully analyze and disclose what genuine co-management will look like on USFS lands. It is now recognized that notions of "pristine wilderness" are Western philosophical constructs that ignored the effects of genocide and forced removal of Indigenous peoples from their homelands. There is a danger that the concept of "MOG protection" will harbor similar assumptions. Tribes have sovereign rights to steward cultural resources and sacred sites on their homelands, and this may include MOG forests. MOG protection rules must not restrict Indigenous peoples from accessing MOG forest for cultural resources or ceremonial uses, for example, the taking of individual MOG trees for carving canoes. The FEIS must acknowledge that many MOG forests were outcomes of landscape stewardship and resource management of Indigenous peoples even if they were not intended objectives. The FEIS needs to define, analyze, and disclose the concept of co-management with the Tribes much more fully.

Thank you for this opportunity to comment on the DEIS. We look forward to reading the FEIS with the corrections and revisions we have noted above.

Sincerely,

Timothy Ingalsbee, Ph.D.

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