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Comments: Comments on Sequoia and Sierra National Forests Prescribed Fire Project

The assessment of the need for prescribed fire and of desired conditions was thorough. However, there were some things that I didn't find in the document (although I may have missed them), and I will describe them below.

Public feedback

The public should be allowed to comment on the proposed actions on a yearly basis.

Prioritization of treatment areas

In addition to the stated prioritization criteria for treatment area choice, creating a mosaic fire and seral succession structure should also be criteria. This will lead to furthering forest resilience and health.

Vegetation types with a high fire return interval should be the lowest priority for prescribed fire.

Desired conditions

Desired conditions should include an assessment of and management for understory species as well as tree species. A forest is an ecosystem and should be managed as such.

Invasive species

Mechanical treatments, construction of fire breaks, and fire will increase the incidence of invasive species. The preventive measures described will help but are not sufficient to stop the increase of weeds. For this reason, mechanical treatments should be minimized whenever possible, bare ground creation and soil disturbance should be avoided, and understory plants should be left alive whenever possible. Invasive plant species populations, in addition to being identified, flagged and avoided, should be eradicated, and measures taken to survey for and eradicate invasive species incursion post treatment.

Thinning as a pre-treatment for prescribed fire

Snags

While snags are mentioned in discussion of sensitive and threatened species sections, there is no specificity for snag size and retention in the pretreatment and treatment sections. This should be specified in the desired conditions to ensure sufficient snags are left.

Blue Oak

Blue oak tree diameter is poorly correlated with age, such that a small tree (8 in. diameter) could be 100 years old. Blue oak and interior live oak recruit poorly, so that replacement of older, larger diameter trees is a long-term prospect, and with climate change, may not happen at all.

Blue oak woodland and grassland is characterized by well-spaced trees. For all of the above reasons, there should be no thinning of live trees before prescribed fire applications.

Other

Any thinning of live trees that occurs in preparation for prescribed fire should belong to overrepresented species that are shade tolerant and fire intolerant, such as white fir and incense cedar. No other live trees should be cut.