



Via email: [comments-pacificsouthwest-sierra@fs.fed.us](mailto:comments-pacificsouthwest-sierra@fs.fed.us)

October 27, 2018

Dean Gould, Forest Supervisor  
Sierra National Forest  
1600 Tollhouse Road  
Clovis, CA 93611

Re: Re-initiation of Scoping for your Forestwide Prescribed Fire Project

Dear Dean:

We appreciated meeting with you and your staff October 23 at your office in Clovis, CA to review your planned FY 19 sale program and to discuss other industry concerns. We briefly shared our concerns on your October 17, 2018 letter re-initiating scoping on your Forestwide Prescribed Fire Project and said we would submit our concerns in written form as requested by your October 17 letter.

The expanded prescribed fire program would increase the total amount of prescribed fire used outside of wilderness from 10,000 acres up to 50,000 acres per year for the next 15 to 20 years. We support the use of prescribed fire to reduce fuel loading and reduce the risk of catastrophic wildfire where appropriate but are concerned that the scoping letter does not list any criteria to determine when the use of prescribed fire may not be appropriate such as in young stands or regenerated plantations or may require special burn procedures to avoid unwarranted damage to young stands of trees.

The scoping document is completely silent on the use of mechanical treatments and thinning to reduce the extremely high fuel loading described in the document. The environmental assessment must disclose that many hundreds of acres of mechanical treatment are done each year on the Sierra NF and could be expanded if changes in forest plan restrictions were allowed. The environmental assessment must also disclose that, often, mechanical treatment is *necessary* prior to the effective use of prescribed fire. The introduction of fire onto certain forest stands containing a high level of tree in-growth *without* the proper removal of those trees could result in undesired conditions due to more intense fire severity. Mechanical treatments such as thinning utilize the carbon in the thinned trees and reduce the amount of carbon released to the atmosphere. The document should also make it clear to the public that the carbon released by prescribed fire goes directly to the atmosphere and contributes to global warming, although less than is released by catastrophic wild fire.

We suggest that the section of "Design Criteria" include an explicit statement that stands of young trees and plantations needed for the future will be protected with special burn precautions.

Also, Silviculturalists' input must be considered in large scale projects and high-risk projects such as burning in plantations. Monitoring of the effectiveness the project burns must be completed and documented.

As we have discussed on several occasions, the Sierra NF has many thousands of unstocked or marginally stocked productive forest land resulting from large catastrophic fires in the past decade and from the recent mortality epidemic. Your new draft forest plan, due to be issued in the next several months, must address reforesting this unstocked land to ensure both wildlife habitat and a growing forest to maintain the remaining sawmill infrastructure in the southern Sierras, a Regional Forester's goal. Use of prescribed fire to burn thousands of acres of the Sierra NF each year may not be compatible with the hoped-for reforestation of thousands of acres of productive forest land.

Sincerely,

Jerry Jensen  
AFRC South Sierra Contractor

cc: AFRC Monitoring Group  
Steve Brink, Vice President, CFA  
Ray Porter, District Ranger, High Sierra RD  
Mike Price, Sierra/ Sequoia TMO  
Barney Gyant, Deputy Regional Forester  
John Exline, Regional Office



