



## AMERICAN FORESTS

September 5, 2019

Planning Team Leader

Forest Plan Revision

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### **RE: American Forest comments pertaining to the Sierra and Sequoia National Forest's Revised Draft Management Plans and Environmental Impact Statement**

Dear Planning Team Leader,

American Forests would like to applaud the planning team and the Sierra and Sequoia National Forests for the time and consideration that was put into revising the joint draft Environmental Impact Statement (EIS) and the respective draft forest management plans. The large-scale tree mortality emergency drove the need to revise the original draft EIS and management plans, but the planning team has used this as an opportunity to build in increases to climate adaptation, forest resilience, partnerships and collaboration, as well as increasing the overall pace and scale of restoration.

American Forests is the oldest national nonprofit conservation organization in the U.S. and has been a catalyst for many key milestones in national forest policy and practices, from the founding of the U.S. Forest Service and the national forest system to public education efforts. American Forests' mission is to create healthy and resilient forests from cities to wilderness, in order to deliver essential benefits to climate, people, water and wildlife. The state of California is in a forest health crisis due to drought, climate change, and catastrophic wildfire, and our nation's forests are on the front lines. Therefore, having reviewed the draft EIS and the Sierra and Sequoia draft Forest Management Plans with these goals and interests in mind, American Forests would like to provide the following comments and/or recommendations:

- **American Forests supports the increased use of prescribed fire as a treatment tool.** Prescribed fire is known to be one of the best ways to increase large landscape vegetation management and is a common tool in eastern forests. Prescribed fire is a lower cost alternative to manual treatment where mechanical treatment cannot be implemented due to site conditions. Although prescribed fire has significant impacts to air quality and GHG emissions, fuel treatments can avoid the much higher costs

associated with a catastrophic wildfire<sup>1</sup>. Studies have also shown that prescribed fire has three times less harmful particulates than wildfire<sup>2</sup>, resulting in an overall lower air quality impact. Increasing the use of prescribed and managed fire also adheres to the goals of the National Cohesive Wildland Fire Management Strategy and will help promote efforts toward full scale implementation of the strategy.

- **American Forests supports the inclusion of climate change adaptation strategies in long term forest management planning.** As the co-lead for the Forest-Climate Working Group and an Impact Partner to the U.S. Climate Alliance, American Forests is a noted leader in promoting forests as climate solutions. Reducing the carbon losses from forests due to catastrophic wildfire is essential to California's long-term climate goals set by the USDA Forest Service Pacific Southwest Region in the CA Forest Carbon Plan<sup>3</sup>. Utilizing a mixture of adaptation strategies will increase forest health and resilience while continuing to support critical forest management infrastructure. The alternatives that clearly support climate adaptation strategies include alternatives B & D.
- **American Forests recommends supporting alternatives that increases fuel reduction, reforestation and restoration.** The proposed plan would increase the total acres of fuel reduction, reforestation, and restoration on the landscape. An increase of pace and scale of treatments are needed in order to address forest health, and to reduce the risk of large-scale catastrophic wildfire. Furthermore, reforestation is a major carbon sequestration opportunity; recent studies have shown that global reforestation could reduce the atmospheric carbon pool by 25%<sup>4</sup>. In many cases, site preparation including thinning, prescribed fire or restoration treatment, is required before reforestation can be implemented.
- **While American Forests supports the proposed action, our preference is alternative D: Maximum Active Restoration, because it best achieves the plan's objectives while also increasing restoration types and acreage per year.** While the proposed plan using alternative B still meets all objectives under the plan, it does not sufficiently increase the pace and scale of restoration needed. Alternative D would double the treated acres with the goal of improving long-term sustainability and climate resilience over short term impacts. The four identified Focus Landscapes will allow for opportunities to

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<sup>1</sup> Mokelumne Watershed Avoided Cost Analysis, <https://sierranevada.ca.gov/mokelumne-watershed-analysis/>

<sup>2</sup> Liu et al 2017. Airborne measurements of western U.S. wildfire emissions: Comparison with prescribed burning and air quality implications. 6108–6129. Retrieved from <https://doi.org/10.1002/2016JD026315>

<sup>3</sup> CA Forest Carbon Plan. 2018. <http://resources.ca.gov/wp-content/uploads/2018/05/California-Forest-Carbon-Plan-Final-Draft-for-Public-Release-May-2018.pdf>

<sup>4</sup> Bastin et al 2019. The Global Tree Restoration Potential. <https://science.sciencemag.org/content/365/6448/76>



return fire to the landscape through fuel breaks and strategic treatments, implement reforestation and restoration activities, and manage remaining higher density forested areas.

Alternative D identifies more acres for timber suitability, which would support local timber industry as well as community-scale biomass initiatives. Additional reforestation acres are identified under this alternative. In addition, this alternative includes management options to react to large scale disturbance like tree mortality, which is sorely needed for addressing public health challenges. This alternative is the best plan to react to a changing climate and achieve long-term resilience.

The revised draft management plans will benefit from use of an adaptive management framework which allows for amendments when conditions or best practices shift. This plan strikes an important and necessary balance of trade-offs between socioeconomic benefit and the conservation of the biophysical sustainability. Increasingly forests are being managed for not just structural complexity but as adaptive complex systems, of which humans are a necessary part<sup>5</sup>. Adaptively managed forests with long-term monitoring are our best opportunity to promote the resilience of forest landscapes, and to inform future changes to silvicultural practices.

American Forests appreciates the opportunity to provide comments and looks forward to a final plan that supports working landscapes, natural resource benefits, and active climate stewardship. Please do not hesitate to reach out to discuss this further. Thank you for your time and efforts.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Brittany Dyer', with a large, stylized loop at the end.

Brittany Dyer

California State Director

American Forests

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<sup>5</sup> Fahey et al 2018. Shifting conceptions of complexity in forest management and silviculture. <https://doi-org.ezproxy.proxy.library.oregonstate.edu/10.1016/j.foreco.2018.01.011>