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RE: Scoping comments on Tahoe National Forest Plan Amendment: Managing Naturally Ignited Wildfire for Resource Benefits

Sierra Forest Legacy and our coalition partners submit the following scoping comments on the Tahoe National Forest’s (TNF) proposed forest plan amendment: Managing Naturally Ignited Wildfire for Resource Benefits (hereafter “wildfire amendment”). In general, we are highly supportive of this plan amendment and view natural ignitions as a critical tool for restoring resiliency to forest landscapes throughout the Sierra Nevada. We appreciate the TNF’s work to incorporate stakeholder input throughout the formation of this project and hope that we can continue working with the Forest’s fire staff to make adoption and implementation of this amendment a success.

We offer the following comments on how to best utilize the wildfire amendment moving forward:

Spatial application of the wildfire amendment:

As written, the proposed wildfire amendment isn’t accompanied by a map or any other spatial component governing which areas of the forest will or won’t be considered appropriate for managing naturally-ignited wildfires. Instead, the amendment gives fire managers the ability to make decisions tailored to each individual ignition while providing strong guidance on what factors should influence their decision. We believe that this existing guidance is sufficient and that new maps are not necessary for fire managers to make safe, ecologically-sound management decisions when natural ignitions do occur.

If the forest does decide to include new maps with the final wildfire amendment, we feel that the 4-part dynamic Strategic Fire Management Zones (SFMZs) included in the 2019 Revised Draft Land Management Plans for the Sierra and Sequoia National Forests provide a good model. As with the TNF’s wildfire amendment, the SFMZs allow fire managers to manage natural ignitions for resource benefits anywhere on the forest, but acknowledge that doing so would be less likely in the two “protection” zones closer to communities. The SFMZs also allow for boundary changes in scenarios where changed conditions warrant a new fire management strategy. One benefit of adopting SMFZs is that unique plan components can be crafted for each zone (see pages 67-71 of the [Sierra National Forest’s 2019 revised draft plan](#) for examples). Apart from SMFZs, we encourage the Forest to use and make public available

risk management strategies like Potential Operational Delineations (PODs) that help guide fire management decisions.

Regardless of whether the TNF includes a spatial component in the final wildfire amendment, we hope that fire managers retain the flexibility to manage wildfires across all or a vast majority of the forest. We make this recommendation in part to encourage the TNF to make use of smaller (<300 acres) fires, even if they occur in areas of public/private land fragmentation such as in the checkerboard. These smaller fires have the potential to impart landscape resilience over time by creating fuel-reduced anchor points from which to ignite future prescribed fires or manage future wildfires for resource benefit.

Public outreach during wildfires:

The proposed plan amendment will provide the TNF will numerous opportunities to educate the public about the natural role of wildfire in California. A significant portion of the public pays attention to wildfires while they are burning either through Forest Service and CAL FIRE news updates or through local media outlets like Yubanet. We encourage the TNF to take advantage of these opportunities by clearly communicating the reasoning behind their decision to manage a wildfire for resource benefit through regular updates to the public.

The excerpt below from the Inyo National Forest is a good example of positive Forest Service communications during a “managed” fire. The example comes from an Inciweb update during the Cow Fire, which burned during the summer of 2019:

“The ecosystem within the Cow Fire footprint will benefit from the low-intensity fire effects observed on the landscape. Lightning-caused wildfires have a natural role to play in Eastern Sierra forest ecosystems. Burned materials recycle nutrients back into the soil which enriches it and stimulates vegetation growth. New grasses, shrubs and trees replenish and grow stronger while old growth stands become more resilient. Wildlife habitats are created and an increase in food becomes available for animals to forage. The hazardous accumulation of logs and overgrown surface fuels on the forest floor are reduced which diminishes the risk of severe wildfires in the future. Heat from fire opens the strong resin which holds seeds inside of the serotinous cones of Lodgepole Pine, allowing the species to reproduce.”

This sort of information plays an invaluable role in helping the public understand and appreciate USFS decision making. The TNF’s proposed amendment has potential to help build public understanding of the nuance around “good” or “bad” fire in California. SFL and other NGO partners will gladly help amplify these messages during and after wildfires.

Use collaborative projects to expand wildfire management opportunities:

The TNF is currently involved in multiple large-landscape collaborative planning efforts including the North Yuba Project, the Tahoe Central Sierra Initiative, and the Trapper Project. We recommend using these projects as opportunities to plan for future natural ignitions. During pre-scoping meetings for the TNF’s wildfire amendment, fire managers expressed concerns that certain areas (notably, the North Yuba canyon above Downieville) are so far departed from natural fire return intervals that managing naturally-ignited wildfires may not be feasible regardless of conditions at the time of ignition. Given that wildfire is inevitable across the vast majority of the TNF, it is imperative that the Forest plan proactively to prevent the loss of invaluable forest resources to future wildfires that burn in unfavorable conditions. These areas should be identified and prioritized for prescribed fire and mechanical treatments that will

improve future fire effects and create anchor points throughout the landscape to safely and effectively manage future wildfires for resource benefit. The potential Collaborative Forest Landscape Restoration Program project currently proposed for the Yuba Watershed would provide an ideal setting to help prioritize these treatments.

Work with land trusts and other partners to expand wildfire management opportunities:

The TNF is among the most fragmented forests in the entire national forest system in terms of interspersed parcels of public and private land. These interwoven property boundaries make landscape-level ecosystem management strategies (including fire management) difficult to implement at meaningful scales. Efforts by nonprofit land trusts over the past several decades have significantly improved the connectivity of protected public lands across portions of the TNF. As the Forest continues working with these organizations, we recommend prioritizing private lands for future acquisition that would expand fire managers' ability to let beneficial fires burn across larger areas.

Thank you for the opportunity to comment on this essential project. We look forward to continuing our work with you to restore healthy, fire-resilient forests across the TNF.

Sincerely,

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