

The Fire Restoration Group



September 26, 2019

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Sierra Cascade Province

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RE: Letter of Support for the Ishi Wilderness Prescribed Fire Project

Forest. The Fire Restoration Group helped initiate, and are strong and committed supporters, of the Ishi Wilderness Prescribed Burn project on the Lassen National Forest with the purpose to establish and maintain fire as a natural ecological process consistent with the 1964 Wilderness Act and the best available scientific information.

For far too long Wilderness Areas have been considered “off limits” to most active management such as re-establishing fire as a key natural ecological process and lowering the unnatural fuel loading due to significant (human-caused) departure from the natural fire return interval. It is troubling to me that while the Wilderness Act allows active, aggressive, and often damaging fire suppression we have thought that active fire restoration to mitigate the dangerous fuel loads to be off limits. We need to put an end to that thinking and do so in an ecologically and culturally appropriate manner.

The Ishi Wilderness Prescribed Fire project will help to reverse the unnatural fuels conditions that have been building for years through fire suppression and fire exclusion, basically in contradiction with the Wilderness Act’s definition of the “earth and its community of life are untrammelled by man” and the requirement to “preserve its natural conditions which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable”. The Wilderness Act Section 2 (c)

The 41,100-acre Ishi Wilderness is the only wilderness that **preserves a major area of the Sierra Cascade foothill ecosystem.** It also has a huge cultural significance being the home of the Yahi people who utilized fire across a full range of natural resource management choices in their extensive occupation of this area prior to European settlement. We need to honor the Native American cultures of the area by re-establishing fire consistent with the best available ecological and social science.

The Ishi Wilderness Prescribed Burn Project is also consistent with the Lassen Forest Plan:

The Management Direction for the Ishi Management Area -48 p.4-275

Standard and Guidelines Fire and Fuels

1. Development and implement a wilderness prescribed burn plan.
2. Allow fire to resume its natural role in the wilderness ecosystem except where it may endanger public safety or private lands.

Finally, the watershed values of Deer Creek and Mill Creek are two of only a handful of major headwaters streams in the Sierra/Cascade bioregion which still support rare and endangered salmon and steelhead fisheries and the Ishi Pineries (see below) are scientific reference sites for low elevation intact forest ecosystems which help agency ecologists and research scientists better understand these systems and their suite of natural processes, such as fire. As such they more than meet the wilderness criteria for scientific investigation and should be maintained as reference sites functioning within their natural range of ecological variation.



Figure 2—An example of the clumped tree distribution and canopy gaps produced by an active fire regime. The photograph is an aerial view of the Beaver Creek Pinery, which has experienced very little fire suppression.

The Fire Restoration Group is committed to support the Ishi Wilderness Prescribed Fire project through science-based communication and outreach and will engage the Fire MOU Partnership and seek support from the 38 current State, Federal and NGO member organizations.

Sincerely,

A handwritten signature in black ink that reads "Craig Thomas". The signature is written in a cursive, flowing style.

Craig Thomas, Director
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