Chris Valle-Riestra
257 Vernon St. #321
Oakland, Calif. 94610
(510) 437-0848 (M)
(510) 891-0621 (B)
E-mail: ChrisPValleR@gmail.com

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VIA WEB PORTAL

Ruth D'Amico, District Ranger
Attn.: Danika Carlson
Salmon-Scott Rivers R.D.
Klamath National Forest
11263 N. Highway 3
Fort Jones, Calif. 96032

Re: Bear Country Project (#54255)

Gentlepersons:

Please consider these remarks in response to your request for scoping comments pertinent to the environmental assessment for the proposed Bear Country Project.

Thank you for the opportunity to take part in the recent site inspection in the Black Bear Creek area. It was a pleasure to meet with staff working on this project, and to learn more about the natural environment and Forest Service activity in this area.

The written Bear Country Project Proposal states that the purposes of the project are "community protection and public and firefighter safety; [and] to protect, promote, and enhance a diversity of seral stages and habitat types." I generally support these objectives, and the methods proposed to achieve them. Please consider the following remarks in that context.

As events in these mountains have demonstrated time and time again, we must anticipate that every part of the project area will burn at some point in the not too distant future, and will burn again periodically. This may be the result of prescribed fires or of wildfires, but either way it will happen. Historically, there were frequent small fires in these mountains, influenced by native American management of the vegetation in combination with lightning strikes. Principally within the past 150 years, fire suppression has led to large increases in fuel loading in many large tracts of forest and chaparral. In reality, fire suppression has only succeeded in extinguishing or limiting the size of smaller fires, or slow-moving fires occurring during times of weather and fuel moisture conditions,

such that firefighting activity could be successful. This suppression has resulted in increased fuel accumulation, leading to the larger fires occurring during adverse weather conditions becoming more catastrophic. Efforts to prevent the burning of stands of forest have thus turned out instead to result in their destruction on an increasing scale. Also, logging operations have been followed by the growth of large plantations of small conifers, which remain highly flammable for decades and on occasion lead to fires spreading into the crowns of adjacent old growth forests that would otherwise be more fire resilient.

The Project Proposal recognizes that these conditions presently exist. The challenge lies in finding a path forward to create landscapes in which future fires will not be so catastrophic. The evidently most attractive option is to attempt to recreate the vegetation patterns and fire regime that prevailed for 2000 years or more as a result in part of native American burning. What vegetation patterns before human occupation of these lands might have been is now hard to say, and returning to landscapes not influenced by human activity would undoubtedly be a violent process involving in the shorter term very large disruptions to existing vegetation over a period of hundreds of years.

If returning to the landscapes and fire regime that prevailed 150 years ago is the goal, the question becomes how to go about making that transition. It will not be possible simply to suspend all firefighting efforts, and set fires deliberately according to the patterns that native Americans followed, because the present fuel loads would predictably lead to large conflagrations. Instead, ways must be found to bring fuel loads down gradually, until the project area as a whole becomes more fire resilient, and methods closer to the historical fire regime can then be followed.

These considerations lead me to the following points:

o The Bear Country Project plan should be developed for the long term. This should not be viewed as a one time effort that will accomplish some changes to the landscape and that could then be considered complete. Reduction of fuels and understory has only a transitory benefit, unless the treated locations are revisited regularly. The forest will continue to grow, trees and shrubs will continue to be shaded out and die, and dead fuel will continue to accumulate. Therefore, the plan needs to set forth action to be taken into the indefinite future.

o The plan as currently envisioned calls for mechanical treatment to large areas. Repeated mechanical treatments to fuel breaks along roads, ridges, and so forth may be appropriated into the indefinite future. However, as to larger tracts of natural forest and plantations, emphasis should be given to using prescribed fire for future fuels management, following the initial mechanical treatment. Use of prescribed fire will better mimic natural processes, should be less labor intensive, and will minimize the need for the use of heavy equipment and creating or reopening roads, with the associated negative impacts on the environment.

o The preliminary plan speaks of a goal of compartmentalizing future wildfires, to aid in controlling their spread. During the recent site visit, staff noted that certain areas had relatively clean understories, and opined that they would likely not need prescribed fire or other treatment for 10 or 20 years. However, please consider that initially, it may be easier and safer to conduct prescribed burns in these very locations, as opposed to locations with heavier fuel loads. Doing so would reduce ground fuels to a minimum, creating some very effective fuel breaks, and maybe making it

possible subsequently to conduct prescribed burns in adjacent, now more compartmentalized areas of heavy fuels, at lower risk. The environmental assessment should review the best available scientific knowledge to design the most effective patterns for conducting series of prescribed burns, or for maximizing the effectiveness of treatments in limiting the growth of future wildfires.

o Consider the expansion of the use of prescribed fire greatly beyond the acreage designated in the preliminary plan. As I've said, all of these areas will burn, like it or not, in the relatively near future. In many cases, it would be desirable to have this happen as a result of prescribed burns. Large wildfires are all too likely to occur in late summer or autumn, when vegetation has dried out, and during periods of hot weather and wind. The results in tracts that have high fuel loads could be very unfortunate.

o As I have said, this should be a long term project. The initial cycle of prescribed burning of target areas should realistically be envisioned as taking 20 years or more.

o I think it critical that a great deal of flexibility be built into the plan. Instead of the treatment prescriptions for specific tracts being set in stone, there should be room for responding to changing conditions. Some parts of the project area will burn at unanticipated times, in unanticipated ways. If a pine plantation burns up entirely, then commercial or precommercial thinning of that tract will no longer be an option. The most suitable locations for fuel breaks and for prescribed burns with the goal of creating areas of low fuels may change dramatically over time.

Specifically, please drop consideration of commercial taking of trees in natural stands within 250 acres of the "Black Roadless Area." Although perhaps not a great candidate for wilderness designation due to size and configuration, maintaining significant roadless areas, such as this, has great benefits in providing intact, contiguous habitat for wildlife and plants. This is the largest roadless tract remaining in the project area. Hand treatment of lands within this roadless area could be substituted as appropriate.

Express provision should be made in the plan for protecting the largest old trees. The preliminary plan speaks of treating certain areas to promote biologically diversity and a mosaic of vegetative patterns. Stated objectives include maintaining meadow areas and oak woodland habitat. However, these goals can be accomplished by removing incursions of younger conifers. Older trees should be retained. Please include provisions for keeping all trees over a certain stated size, probably 24 inch diameter, with rare exceptions allowing the taking of individual trees to ensure the effectiveness of shaded fuel breaks.

Please consult the best science, and incorporate conclusions, as to the degree to which thinning operations should be allowed to open the forest canopy. Excessive removal of canopy can increase the solar radiation received by ground level vegetation, and create more flammable conditions.

Thank you again for the opportunity to participate.

Very truly yours,

Chris Valle-Riestra