##### Mid Klamath Watershed Council

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Ruth D’Amico

Attn: Danika Carlson

Salmon/Scott Ranger District

11263 North Hwy 3

Fort Jones, CA 96032

Danika.carlson@usda.gov

**RE: Bear Country Project Scoping**

Dear Ruth, Danika, Sam and the Bear Country Project Planning Team,

Please accept these comments from the Mid Klamath Watershed Council, and from Western Klamath Restoration Partnership co-lead Will Harling. Since the USFS is a key partner in WKRP, we have chosen not to submit comments through WKRP, however these comments invoke lessons learned from our collaborative WKRP project planning as they apply to the Bear Country Project.

First we would like to offer our appreciation for the level of effort the project planning team has put into engaging the community and key stakeholders in this project. Given the short timeline that was decided on for this project, there has been substantive effort put in to collecting feedback on the project as it develops. That said, the project timeline itself is a major limiting factor for meaningful collaboration. KNF staff are working full time on this project to meet project deadlines, and interested parties and tribal and NGO partners simply cannot dedicate the necessary time to provide the substantive feedback requested.

Lessons learned from past WKRP and non-WKRP projects are that community and partner engagement are significantly minimized by the simple fact that many WKRP partners have had to volunteer time to attend field trips, review and create alternative maps and shapefiles, and provide these comments. After several nights of five hours or less sleep, I find myself working on comments for this Bear Country Project to submit at the last minute in order to provide some feedback, when it deserves a much more thorough effort.

The model of community engagement the Klamath NF has chosen to employ for this and other recent fuels management projects continues to not meet the definition of collaboration used by WKRP, the US Fire Learning Network and academic researchers. There is no partner representation on the ID team, no funding to support substantive partner engagement in the project, and most importantly, no guarantee that any of the feedback provided by the community or WKRP partner organizations will be incorporated into the final project. We strongly encourage the Klamath NF to engage with WKRP on planning mechanical thinning projects within the 1.2 million acre WKRP area through an inclusive, collaborative process similar to what was modelled through the Somes Bar Integrated Fire Management Project. Interagency crews worked together throughout project planning and development, greatly increasing local capacity and ability to work at the landscape scale and building trust along the way.

This trust is the foundation of our $40 million CFLRP proposal that was just selected for a Tier 2 submission, and has potential to fund significant work on the Klamath and Six Rivers National Forests over the next decade. These funds can reduce the need to utilize timber receipts to accomplish service work and allow us to focus more on ecosystem restoration at the landscape scale, with timber as a restoration byproduct. It is clear that initial project maps were based off an analysis of merchantable timber in the planning area. This is not an advisable starting point for a project aimed at restoring forest resiliency and fire process at the landscape scale.

This landscape has been mined for timber following major fires in 1977 and 1987, as well as subsequent timber sales that left remaining natural timber stands in locations that are only accessible by helicopter, in NSO activity centers or critical habitat, or on unstable soils. This project should not be guided by timber outputs as potential funding is available for landscape level ecosystem restoration treatments through multiple sources including CFLRP, NFWF, Joint Chiefs, CALFIRE Forest Health and others. There is a growing body of scientific evidence showing these mechanical thinning treatments do not achieve the goal of reducing fire severity or improving the long term health of forest stands.

The scoping document states that timber output is a goal of this project. As someone who had a front row seat for the tens of thousands of log trucks that came off the Picayune carrying a steady stream of timber for over two decades, I cannot express how disturbing it is that the Klamath NF would come back the few remaining late seral stands in the project area to achieve their annual timber targets. The draft NEPA document for the Bear Country Project needs to provide a thorough analysis of the cumulative effects of the proposed actions and alternatives on soils, hydrologic function, fisheries, habitat and wildlife in the context of past, present, and reasonably foreseeable future actions in and surrounding the project area. In a time when our few remaining wild Spring Chinook salmon are hanging on by a genetic thread, further impacting this landscape through large scale mechanical thinning is ill advised. Mechanical thinning treatments should only be utilized where they allow for the safe reintroduction of prescribed fire to the landscape.

We strongly encourage planners to develop a holistic strategy for restoring fire process on this particular landscape, and designing treatments that allow for the safe reintroduction of fire at meaningful scales. Project treatments should focus on:

* Creating strategic fuelbreaks along collaboratively identified Fireshed boundaries, around private inholdings, and along critical access and egress routes.
* Thinning in plantations that do not require extensive temporary new road construction.
* Large scale prescribed burn units similar to the Eddy LSR that restore fire process at the watershed scale. If needed these units could be broken into smaller sub-units to reduce risks associated with burn implementation. Large patches of the Bear Country planning area have relatively light fuels after two major wildfires and could receive larger scale prescribed burns with reduced risk of escape.
* Incorporation of defensible space treatments on private inholdings.
* Coordination with ongoing instream restoration treatments to analyze potential projects in the planning area, as well as provide whole trees from mechanical treatments for utilization in these instream projects.

We recommend that the KNF consider conducting private lands NEPA to expedite treatments on both private inholdings within and adjacent to the project footprint to build social license for the project. The Six Rivers National Forest facilitated the WKRP Private Lands Fuels Reduction CE on an expedited time frame, forgoing on the ground arch surveys and just doing a records search. This CE then allowed local partners to secure matching funds for these private lands treatments and gain social license for the implementation of the Somes Project on adjacent public lands. Archaeological surveys were completed by the Karuk Tribe THPO as funding was secured, minimizing the time and cost of the initial Categorical Exclusion.

In order to stay on the project timeline, we have heard that KNF staff have already begun marking mechanical units on the ground while not specifying any potential mechanical thinning units on the scoping documents/maps. By the time the public comment period for the Draft EA is solicited, there is very little flexibility to alter the project. If the Draft EA is released and it has the acreage of mechanical thinning units similar to what is described in Table 1 of the scoping document, it will further erode trust in a time when we need to be building a shared vision for managing fire on this landscape. We strongly encourage a tactical pause on unit marking unit there has been more substantive input from the community and WKRP partners.

We believe that there is still time to make this project a WKRP project. Limited funding for basic GIS analysis and partner specialist input from the KNF to partners would allow for more robust collaborative engagement and a better end product. Partners have already begun working on maps describing a revised WKRP alternative for consideration. With KNF willingness to call this a WKRP project, WKRP partners can leverage both Federal and non-federal funding to collaboratively plan, implement, monitor and learn from this project through adaptive management. We believe that ultimately, we can go further faster together. The Salmon River watershed is a national treasure, and holds the promise with significant restoration to function as a stronghold for a diverse assemblage of plants and animals in the face of climate change. It is time for us develop a long term shared vision for managing upslope and instream habitats here based on the best available science (including traditional knowledge). The pieces are coming together as we speak.

Sincerely,



Will Harling

Director, Mid Klamath Watershed Council

Co-Lead, Western Klamath Restoration Partnership