

# Salmon River Restoration Council

PO Box 1089 ♦ 25631 Sawyers Bar Rd ♦ Sawyers Bar, CA 96027

Email: [info@srrc.org](mailto:info@srrc.org) ♦ webpage: [www.srrc.org](http://www.srrc.org)

Phone: (530) 462-4665 ♦ fax: (530) 462-4664

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September 6, 2019

Ruth D'Amico  
Attn: Danika Carlson  
Salmon/Scott Ranger District  
11263 North Hwy 3  
Fort Jones, CA 96032  
[Danika.carlson@usda.gov](mailto:Danika.carlson@usda.gov)

RE: Bear Country Project Scoping

Dear Danika and the Bear Country Project Planning Team,

Please accept these comments from the Salmon River Restoration Council, and from Western Klamath Restoration Partnership co-lead Karuna Greenberg.

The purpose and need for this project is to:

Enhance opportunities for community protection and firefighter and public safety:

- o Reduce wildfire threats to communities.
- o Ensure safe ingress and egress travel routes.
- o Establish strategic control features for long-term fire management.

Protect, promote, and enhance a diversity of seral stages and habitat types throughout the project area:

- o Protect high value northern spotted owl habitat from threats of wildfire.
- o Maintain and improve the condition of existing late-successional habitat.
- o Promote forest health and resilience.
- o Restore beneficial fire effects to fire adapted ecosystems.

Complement and enhance previously planned treatments within adjacent project areas to provide for continuity and effectiveness of landscape scale strategic fuel breaks.

## **Collaboration and planning process:**

We appreciate the collaborative intent of the current Bear Country Planning team, and their willingness to respond to community desire to allow more space for community input. While we feel that the intent of the project ID team leads and line officers to increase community input and involvement in the project is genuine and comes from a desire to both make the project better and respond to the obvious desire from the community to be involved in this project, it falls far short of true collaboration.

When we first heard about this potential project at least three years ago, from the then district ranger Ted Mc Arthur, we immediately expressed interest in this landscape and project being a collaborative WKRP project. We were told at that time that this project needed to be fast tracked and that there just simply wasn't time for collaboration. The argument that there is no time for collaboration is particularly hard to accept in this landscape as WKRP engaged with the Yellow Jacket Ridge Project for several years, before it was dropped from planning by the KNF, and then waited for two years for the Bear Country Project to really get going. This two year period could have been spent investing in WKRP engagement in collaboratively developing this project from the very beginning. And we believe would result in a more beneficial project with larger buy in overall.

We believe that there is still time to make this project a truly collaborative 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. There are many benefits to making this a collaborative project. One of these is that the collaborative can bring more resources and perspective to the project resulting in a stronger and more broadly supported project. It builds trust and buy in from local communities and brings place based knowledge to the project. Partners can also bring extensive amounts of funds to support the service work and restoration aspects of the project through multiple sources including CFLRP, NFWF, Joint Chiefs, CALFIRE Forest Health and others. As an example, WKRP has already brought in over \$9,000 million towards fuels reduction and implementation of treatments within and directly around the Somes Bar Integrated Fire Management Project.

We also appreciate the effort of the leadership on this project to get specialists and community members out into the field discussing the real issues in putting together a landscape scale project in this area. We feel that there has been a genuine effort to try to get specialists and the public at large to step out of their habituated roles and ask important questions such as, what is truly needed on this landscape to create resiliency?, how to do we protect and enhance what is important to us?, how do we make this landscape more fire resilient?, etc... This is a change from how we have seen most other USFS forestry projects on the Salmon River and we feel that it is a better approach for initiating a project and actually meeting the purpose and need. However, it is clear that initial project units, which have remained the project unit boundaries with a few additions, were based off an analysis of merchantable timber in the planning area first and foremost. This is not an advisable starting point for a project whose stated purpose and need are to:

- Enhance opportunities for community protection and firefighter and public safety; Protect, promote, and enhance a diversity of seral stages and habitat types throughout the project area; and
- Complement and enhance previously planned treatments within adjacent project areas to provide for continuity and effectiveness of landscape scale strategic fuel breaks.

Trying to use a more holistic approach to planning while still working off of a map created with timber production as the driver is ill advised, and unlikely to result in the goals of forest resiliency and community safety of the purpose and need. It also makes it hard for ID team specialist to take a more holistic approach to coming up with treatments that are beneficial on the landscape.

In general, starting from a holistic perspective of fire process on this particular landscape, and designing treatments that allow for the safe reintroduction of fire helps identify where key treatments are needed. This project has identified strategic landscape level fuelbreaks that tie into recent (or proposed but not yet completed) projects and will provide options for wildfire management. However, the project as proposed misses key opportunities for expanded use of prescribed fire to increase the percentage of the landscape that

receives beneficial fire. And according to the map provided, it continues to focus treatments on areas that have the most potential timber volume.

While we recognize that the forest has timber targets that it needs to meet, this project should not be guided by timber outputs as funding is available for landscape level treatments through multiple sources including CFLRP, NFWF, Joint Chiefs, CALFIRE Forest Health and others. We believe that there are many areas within the ~40,000 acre project scope that would benefit from treatments that include removal of merchantable timber as a true restoration byproduct, we don't think timber production should guide the location or prescriptions proposed in this project. Instead, to meet the purpose and need of the project, the planning should be based on holistically addressing the needs for restoring healthy fire process and function, protecting communities, allowing for safe and effective management of wildfires, protecting critically important remaining old growth and NSO cores, and restoring oak woodlands and diverse forest assemblages.

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.
- Creating 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 (e.g. the areas between the 39 road and Black Bear Creek).
- Restoration of oak woodlands (especially black oak woodlands) and mixed conifer hardwood forests where they were traditionally located on the landscape pre-fire suppression, and in areas where current climate change predictions indicate they are more suited for site conditions.
- Incorporation of defensible space treatments on private inholdings\*.
- Restoring meadows in areas where meadows persist as well as areas that were historically meadow habitat.
- 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 feel confident that if the forest chooses to take a collaborative approach and orient this project around these treatment priorities there will still be substantial commercial restoration byproducts that result from the project.

\*One very successful element of the WKRP Somes Bar Integrated Fire Management Project was the recognition that an all lands approach was necessary to achieve the goals of the project and create the level of community safety needed for the landscape. As the result the Six Rivers National Forest was willing to work with the partnership on a Private Lands Fuels Treatment Project CE (document attached). This allowed landowners to opt in to have NEPA completed for fuels reduction work on their property, which could then be funded through grants and completed by partner organizations. This act of good will and recognition of the need to treat across ownership boundaries built the social license to plan and conduct prescribed fire around and onto private lands.

It is too early for us to tell how this project will turn out. There are a lot of good elements in this project so far that we really support. We also see ways in which these elements could be improved.

#### **Defensible space and community protection:**

We support community protection from wildfires through fuels reduction around private in-holdings, along with fuels reduction along critical ingress and egress routes (so residents and firefighters can get in and out safely), and along strategic ridges and roads for fire management. As outlined in the current map, the protections around private inholdings are woefully inadequate. The Salmon River CWPP call for 500 foot buffers of fuels reduction around private and tribal lands. While we recognize that for optimal safety these lines would be best drawn to defensible features and distances needed to moderate fire behavior, which could be more or less than 500 feet in any given location, the “Reduce Wildfire Threats to Communities” polygons on the current maps as well as those proposed on earlier versions are too small to be very effective at protecting private property and assets from wildfires. Treatment zones around private lands should err on the side being overly ambitious in the analysis stage, even if only a portion of these treatments can be initially treated. These WUI zones are areas where other organizations, such as local non-profits, can get grants to fund and complete treatments if they are included in the NEPA. Multiple properties within the project scope don’t show any WUI treatments at all. We imagine this is based on them not being field verified yet, but it is hard to explain to landowners why one parcel deserves treatment and protection while another does not. Additionally, many inholding have critical infrastructure that reaches out beyond their private property such as water lines. Fuels reduction to protect these systems could be critical for private lands protection during wildfire events.

Private inholdings within the project scope are some of the highest risk private lands within the Salmon River watershed and are designated as such in the Salmon River CWPP. More homes have been lost due to wildfire in Bear Country over the past 40 years than the rest of the watershed combined. Almost all of these losses have been from fires that originated on USFS managed lands. This is not a landscape to skimp on reducing wildfire threats to communities, neighborhoods and inholdings. In light of this, total of 308 acres of treatment around private lands is bordering on insulting. Some of the properties with the highest fire risk don’t show any fuels reduction treatments around them, some only show prescribed fire but not pretreatment. We recognize that additional treatments areas are likely to be added, but even the ones that have been field verified and added do not extend to important control features on the landscape, nor do they extend far enough to adequately moderate fire behavior before reaching the property.

Private properties in their entirety, not just homes and buildings should be treated as if they are the important assets that they are. The value of private land is not limited to the houses that are constructed on them.

#### **Upgrade of ingress and egress routes, many of which are in very poor condition:**

Many of the roads within the Project area are designated as critical ingress and egress routes in the Salmon River CWPP. The current condition of many of these roads are very poor. The 39n30 road is very likely the most used USFS road within the district and yet it is in near to the worst condition. Thirteen years lapsed between the last two maintenance intervals for this road and we are now getting close to that amount of time with not maintenance. The 39 road is the main arterial road through the Bear Country landscape and beyond, connecting Forks of Salmon to the Upper South Fork and many other important roads including to Sawyers Bar and Cecilville. There are places along the 39 road where brush encroaches well into the roadway making it difficult to drive through without scratching your vehicle on at least one side. These access and ingress routes are critical for the safety of those that reside within this landscape, fire fighters safely addressing active



wildfires, and as alternative routes in the relatively frequent events that our main Salmon River roads are closed due to landslides, rocks, and wildfires.

Additionally many of the roads in this landscape have undersized and undermaintained culverts leading to increased roadbed issues. We are happy to see that these sites are identified as legacy sites in the project and would advocate for them being upgraded.

The 39N27 Lewis Memorial Road is also a critical ingress/egress route identified in the Salmon River CWPP. This is the fastest route to the North Fork for residents from Godfrey Ranch and would likely be used if a fire was moving up from the south or southwest. This should be added to the ingress/egress routes and provided adequate roadside and roadbed treatments.

We are glad to see that these access/egress routes are included in this project as important areas for treatment. We feel strongly that the treatments along these roads need to include far more than just fuels reduction along their edges. We suggest that fuels treatments along these roads be analyzed for 300 feet on either side of the road, even if they are mid-slope roads. This allows for reasonable flexibility as there are areas where at least 300 feet would be needed for safety and other areas where less is likely needed. The roadbed of many of these roads, particularly the 39N30, 39N67, and 39 roads, are very hard to safely drive due to the poor condition of the road bed. Over the past several years the 39N30 road where it passes through Godfrey Ranch has degraded to point of landowners being called on to pull through traffic out of deep mud pits and place rock in the road for basic access. There are several places where high waters and plugged culverts have led the roadbed to be badly eroded.

#### **Strategic fuel breaks:**

Strategic fuels reduction and creation of shaded fuels breaks along strategic ridgelines and roads to assist with fire management during wildfires and assist in the safe administration of prescribed fire at favorable times before wildfire events. We support the effort that has gone into identifying strategic fuels breaks on this landscape. We would like to continue to work with the project team to refine them.

#### **Meadow Restoration:**

We support meadow restoration in meadows that have been encroached by conifer trees over the past 100+ years of fire suppression, planted into plantations, and overgrazed by livestock and horses. Meadows are very important biodiversity hotspots in the landscape. They are very important for snowpack and water storage and as sources for cold water for fish bearing streams. They are also ecosystems that are disappearing and being degraded at an alarming rate throughout the west.

Given their ecological importance, meadow systems within the planning area should be assessed for restoration and included in the project. While we support conifer encroachment removal in and around meadows, we encourage the team to look into ways that do not impact the meadow environment through compaction and moving equipment through the meadows themselves. Some areas mechanical tree removal will be possible, but in other areas girdling and manual tree removal should be considered.

Additional meadow restoration treatments should be included in the analysis. For example, many of the meadows within the project scope are chronically over grazed. Within these meadow systems fencing of the most valuable meadows should be included.

SRRC is planning on including the Frisco Lou meadow system, off the 39N27 road between Blue Ridge and Godfrey in a larger meadow assessment grant. It would be great to align this project and the grant so that we

could monitor the effect of the proposed treatments on the meadow and the amount of water coming out of it during base flow months.

### **Plantations:**

We support treatment of plantations on the landscape without building new roads. Many plantations in this landscape represent some of the greatest fire risk to the landscape, adjacent forests and private lands. Most plantations on the landscape are badly in need of thinning to be more resilient to future fires and healthier in general. They are also, for the most part, ecological dead zones. It is very important to increase species diversity within plantations by favoring hardwoods, sugar pines, cedar, and anything other than ponderosa pine. To make this treatment effective it is important to reduce the size limit needed to keep favored species. In some of the plantations treated near Blue Ridge and other areas on the landscape, even though hardwoods were favored, many healthy oaks were removed in favor of larger pines or firs because they didn't meet the DBH requirement to be a save tree. Oak, especially black and white oaks, as well as other hardwoods will respond very well to reduced competition and shading and grow quickly after they are release. The current prescription used in other projects isn't fully meeting the desire to increase diversity in these plantations.

There are several areas within this project scope where plantations were created in previously dry or marginally wet meadow systems. We would encourage the removal of these plantations or at the very least very wide spacing that favors non-conifer species.

### **Oaks:**

As mentioned multiple times, we strongly encourage treatments that favor restoring black and white oak woodlands, a severely diminishing and critically important component of our landscape. We would like to help get certain areas of the landscape designated as black oak restoration zones that would be managed to bring back this important species assemblage that is so important to wildlife, diversity and landscape resiliency. After the 1977 and 1987 wildfires, the black oaks came back from their depressed states with great vigor and health. In areas on private lands where natural regeneration was allowed and plantations were put in, beautiful and healthy black oak woodlands are returning and feeding a myriad of animal species. Where landowners have made small efforts to thin out the oak clumps and conduct fuels reduction these oaks are even bigger and more impressive. There are bands of geographic areas within the Bear Country landscape where black oaks are particularly abundant and should be encouraged to return to the healthy, diverse wildlife habitats that they once were. It is obvious when you look at this landscape that indigenous peoples, likely the Konimihu, actively managed the land for Black Oak acorn production. Some of the larger black oaks on the Salmon River are located at Blue Ridge Ranch. Flat terraces and meadows within this landscape are surrounded by black oaks fighting to come back in post fire landscapes or dying off in conifer encroached stands. These indicators could be used to find mid mature conifer stands that could be thinned to bring back black oaks where appropriate.

### **Sugar Pines:**

Sugars pines were once a much more abundant and even dominant species within areas of this landscape and should be promoted wherever possible regardless of their size.

### **Prescribed fire:**

SRRC is very supportive of prescribed fire in favorable locations around neighborhoods and on the landscape, which is much needed to return more natural fire regimes, increase safety, and give more positive options for

managers during wildfire events. For an ~40,000 acre project, 1,768 acres prescribed fire to restore beneficial fire effects and create fire adapted ecosystems is woefully inadequate. This project needs to analyze much larger areas for prescribed burning to meet the two first elements of the purpose and need:

*Enhance opportunities for community protection and firefighter and public safety:*

- o Reduce wildfire threats to communities.*
- o Ensure safe ingress and egress travel routes.*
- o Establish strategic control features for long-term fire management.*

*Protect, promote, and enhance a diversity of seral stages and habitat types throughout the project area:*

- o Protect high value northern spotted owl habitat from threats of wildfire.*
- o Maintain and improve the condition of existing late-successional habitat.*
- o Promote forest health and resilience.*
- o Restore beneficial fire effects to fire adapted ecosystems.*

There are many opportunities within this landscape for larger scale and additional prescribed fire. Proposed strategic ridge fuelbreaks down to midslope roads or other holding features should be analyzed for prescribed fire. There are also extensive areas within the scope where fuel conditions would be conducive to large landscape level prescribed fires, such as the forests to the north and east of Black Bear Ranch.

This is another area where all feasible areas should be analyzed, rather than including a very conservative estimate, makes sense. This doesn't mean that all of the units need to be burned, and this can be made explicit in the document, but analyzing it gives managers optimal flexibility for using prescribed fire when the right conditions arise. We need to be ramping up our use of prescribed fire not reducing it if we are ever going to get ahead of this cycle of increasing scale of individual wildfires and increasing patch size of high severity fire on the landscape.

There are many landowners within this project scope who are very supportive of prescribed fire. In addition there is a desire among multiple landowners to use prescribed fire as a fuels reduction and landscape maintenance tool to become more fire adapted. However, in many cases the most logical place to start or end a prescribed fire fall off the private property on federally managed lands. These are areas where it is in everyone's best interest to use an all lands approach. With collaborative burning agreements in place and TREX and other collaborative burning opportunities in the area, we should be designing our projects around private lands to allow to cross boundary burns where it makes sense. This is another reason why conducting a private lands CE would be mutually beneficial for the USFS and the community.

#### **Instream restoration and legacy sites:**

SRRC suggests that Matthews Creek watershed and the river reach surrounding the creek mouth be evaluated through this planning process as a legacy site for treatments to enhance water quality and quantity, fisheries habitat, and riparian conditions. Such treatments should include the attached draft conceptual plans developed by SRRC and Stillwater Sciences (2019) to enhance the river reach just downriver of Matthews Creek. Other potential enhancements to the watershed could include, but are not limited to, improving fish passage at the mouth of Matthews Creek, sediment issues caused by the Forest Service road system, road crossings of the drainage system, road improvements, water quality and quantity, riparian enhancement, and fisheries habitat improvement. Degradation of water quality and quantity, fisheries habitat, and riparian conditions in the Matthews Creek and other drainages resulting from past Forest Service land uses (legacy

sites) should be a priority component of this planning process. SRRC and its partners would appreciate developing and evaluating this legacy site further in collaboration with the Forest Service as this planning process develops. (See concept designs attached)

SRRC is very supportive of the proposal to push trees over to maintain rootwads for use in habitat restoration projects. Whole trees and cut trees with rootwads are an essential component of instream restoration treatments throughout the Salmon River. Maintaining the attached rootwad enhances the effectiveness and longevity of using native, natural material for restoration treatments and would be an appropriate use of such materials. Including this option in the planning process for this project allows for future collaborative projects combining upslope forest management with instream restoration in an efficient and proactive approach to whole watershed restoration on the Salmon River.

Where the document mentions that trees with rootwads will be able to be knocked over for habitat restoration, it specifies "to be sold." It would be better to use wording like "to be made available," because in reality these trees will likely be going into USFS projects that occur on and benefit public land, so the USFS should be contributing the logs to these project, not making grantors or grantees buy them from a contractor, or at least leaving that option open. Especially since this project includes work in the Wild and Scenic corridor, and part of their mandate there is that any project should protect and enhance the fishery. Providing trees with rootwads to fisheries restoration is one way that the USFS can meet this goal.

#### **Wild & Scenic Steep River Canyons:**

Much of the proposed helicopter logging in the project area lies within the steep, rugged and often unstable areas of the Wild and Scenic corridors of the North and South Forks of the Salmon River. Most of the unit boundaries uncannily line up with nesting/roosting habitat for the NSO and the last remaining old growth within the project scope. Further a majority of these stands are on northern aspects, which generally have dense forest canopies, critical to the survival of old-growth dependent species. North facing slopes offer moist and cool microclimates that are less prone to high severity fire and are increasingly important for plant and wildlife climate adaption.

While we are not opposed to helicopter logging as a treatment method, the high cost of implementing it generally requires large amounts of timber outputs to make it pencil out financially. Helicopter logging can be one of the least impactful logging techniques, but removing large volumes of timber from these stands does not align with the purpose and need of this project. Helicopter logging can leave a large amount of logging slash on steep slopes, which if not treated and burned manually would significantly increase ground fuels and thus fire behavior. Many of these units are also on unstable slopes or Riparian Reserves. Logging in the Wild and Scenic River corridors may harm the values for which they were designated. We urge planners to drop these units for the reasons above and because they are of low to no priority for treatment and would diminish and degrade habitat.

We have heard from the project team that many of these units will likely get dropped once they have been ground-truthed, either because they are currently in a healthy condition, or they are not safely accessible. There were even specific units that the public were told were dropped from the project that are still on the project map. This leads the public to believe that the team is being disingenuous and is detrimental to the trust building that has begun with the added public involvement.

Table 1, General Forest goal pertinent to this project states, “Provide a programmed, non-declining flow of timber products, sustainable through time. These levels may vary from year to year, based on ecological processes. Maintain conifer stocking levels and high growth rates commensurate with the capability of the site to produce wood fiber. Intensively manage young regenerated stands to maximize growth potential.” Given the current state of the Bear Country landscape, the past poor management history, and the large proportion of the landscape that has experienced high intensity forest fires since 1977, this is not a realistic nor reasonable project goal. 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. Large portions of this landscape, especially on south and west facing slopes, are not suitable for conifer dominated stands and should not be maintained with that goal in mind. Some of the current areas with the highest potential for high severity fire are pine plantations with a brush understory. Given the general warming and drying trends that are predicted and that we are already experiencing as a result of climate change, we should be managing stands towards increased diversity and particularly towards strong oak and other hardwood components.

#### **Mastication:**

We caution the use of very much mastication in this landscape. The Bear Country landscape is very dry and we have noticed that masticated materials take an exceedingly long time to break down. Mastication has a heavy impact on soils and wildlife habitat. Mastication is not fuels reduction, it is simply rearranging of the fuel bed. While mastication has been shown to moderate fire behavior and possibly make firefighting easier, it does not improve fire related impacts on trees and soils over having done nothing. In fact, mastication can increase the impacts for fire on vegetation and soils by concentrating the heat and burning for longer periods of time. For these reasons prescribed fire and mastication can often be mutually exclusive if you want to have low to moderate fire effects. Unless the USFS is willing to have high tree mortality, mastication shouldn't be used in areas where prescribed fire is a potential treatment. Mastication is often encouraged as a low cost way of treating fuels. We find this declaration dubious, since you aren't actually removing the fuels. A cut pile and burn treatment is getting you to a much more complete treatment with fuels actually removed from the treatment area, if you take this into account, the true difference in price is negligible.

In places where plantations are adding little value and are threatening nearby high value areas such as natural stands, high value NSO habitat, etc., mastication could be a cost effective tool to reduce the risk that these plantations are causing to the valued areas by moderating fire behavior adjacent to them. You would run the risk of killing the plantations during a wildfire, but the benefit could outweigh the risk.

#### **Roads:**

The Bear Country landscape is the most highly roaded landscape in the Salmon River District. We cannot support the creation of new roads within this project. The benefits would need to be demonstrated to be exceptionally high for the creation of new roads within the project for it to be worth the increased degradation to an already over roaded landscape such as this.

Recognizing that the US Forest Service has limited capacity and resources and the serious challenges of managing over a million acres, we urge the Klamath National Forest to work with the Western Klamath Restoration Partnership in planning, implementation and future maintenance of this important and large project area. The partnership is building its workforce capacity and has a long-term vested interest in the care

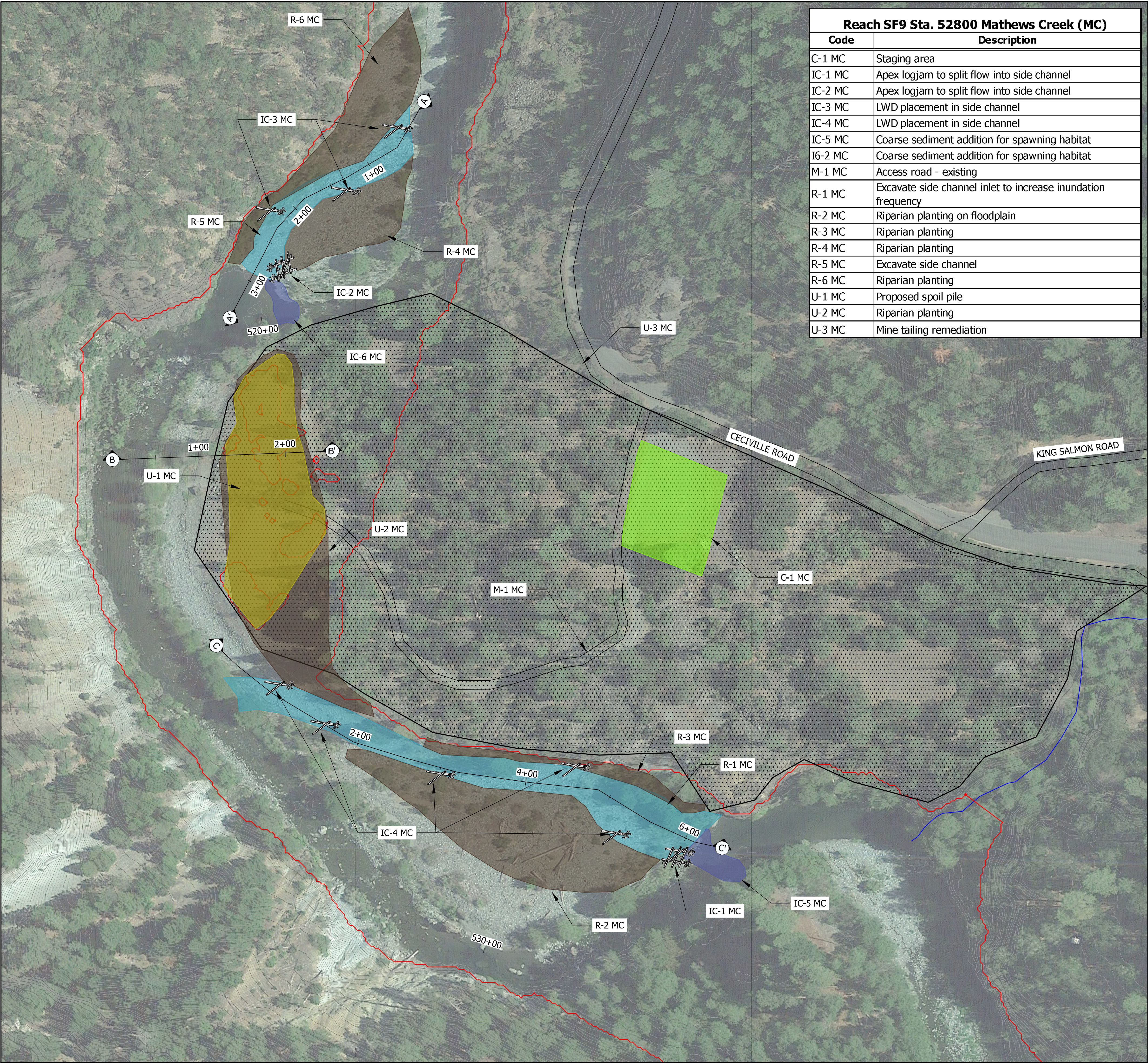
of the Salmon River. Working together provides benefits to our watersheds and communities. We hope to work with you on this project collaboratively so that together we can make this project best that it can.

Sincerely,



Karuna Greenberg  
Restoration Director  
Salmon River Restoration Council  
PO Box 1089  
Sawyers Bar, CA 96027  
srrc.org / 530-462-4665

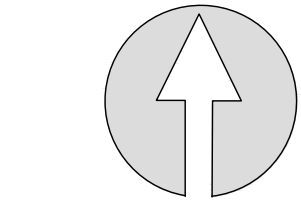




Reach SF9 Sta. 52800 Mathews Creek (MC)	
Code	Description
C-1 MC	Staging area
IC-1 MC	Apex logjam to split flow into side channel
IC-2 MC	Apex logjam to split flow into side channel
IC-3 MC	LWD placement in side channel
IC-4 MC	LWD placement in side channel
IC-5 MC	Coarse sediment addition for spawning habitat
I6-2 MC	Coarse sediment addition for spawning habitat
M-1 MC	Access road - existing
R-1 MC	Excavate side channel inlet to increase inundation frequency
R-2 MC	Riparian planting on floodplain
R-3 MC	Riparian planting
R-4 MC	Riparian planting
R-5 MC	Excavate side channel
R-6 MC	Riparian planting
U-1 MC	Proposed spoil pile
U-2 MC	Riparian planting
U-3 MC	Mine tailing remediation

LEGEND	
####+00	STATIONING IN FEET
	PROFILE LINE
	100-YEAR FLOODPLAIN BOUNDARY
	EXISTING ROAD
	PROPOSED ACCESS ROAD
	MINE TAILING REMEDIATION
	PROPOSED STAGING AREA
	PROPOSED SPOIL SITE
	PROPOSED COARSE SEDIMENT ADDITION
	PROPOSED OFF-CHANNEL HABITAT (ALCOVE)
	PROPOSED SIDE CHANNEL ENHANCEMENT
	PROPOSED OFF-CHANNEL HABITAT (POND)
	PROPOSED CONSTRUCTED INUNDATION SURFACE
	PROPOSED RIPARIAN PLANTING
	PROPOSED LARGE WOOD PLACEMENT
	PROPOSED LARGE BOULDER PLACEMENT
	PROPOSED STREAM CROSSING
	PROPOSED CULVERT

Activity Areas	
Code	Meaning
IC	In-channel
R	Riverine/Off-Channel
U	Upland
C	Staging
M, N	Roads (M=existing, N=new)
X	Temporary Crossings



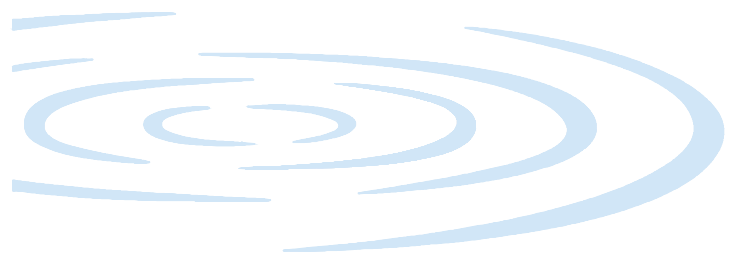
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FEET  
SCALE: 1" = 60'  
2-FOOT CONTOUR INTERVAL

SALMON RIVER  
FLOODPLAIN HABITAT  
ENHANCEMENT PROJECT

SISKIYOU COUNTY, CA

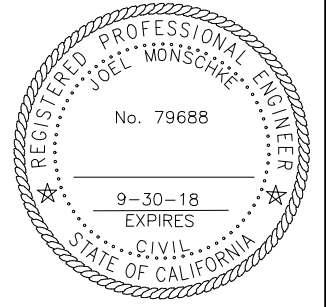
Stillwater Sciences

850 G ST, SUITE K  
ARCATA, CA 95521  
P: (707) 822-9607



SCALE: AS NOTED  
DATE: 9/4/2019

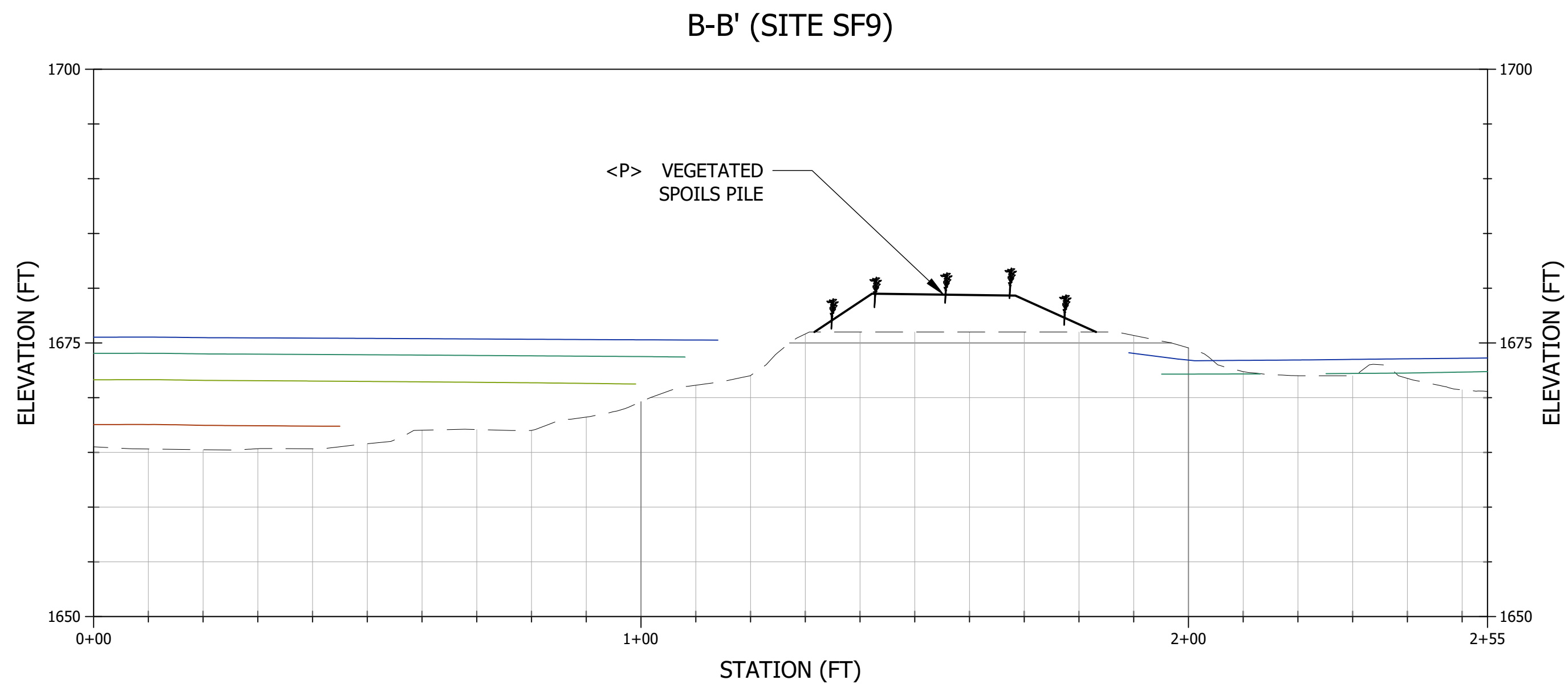
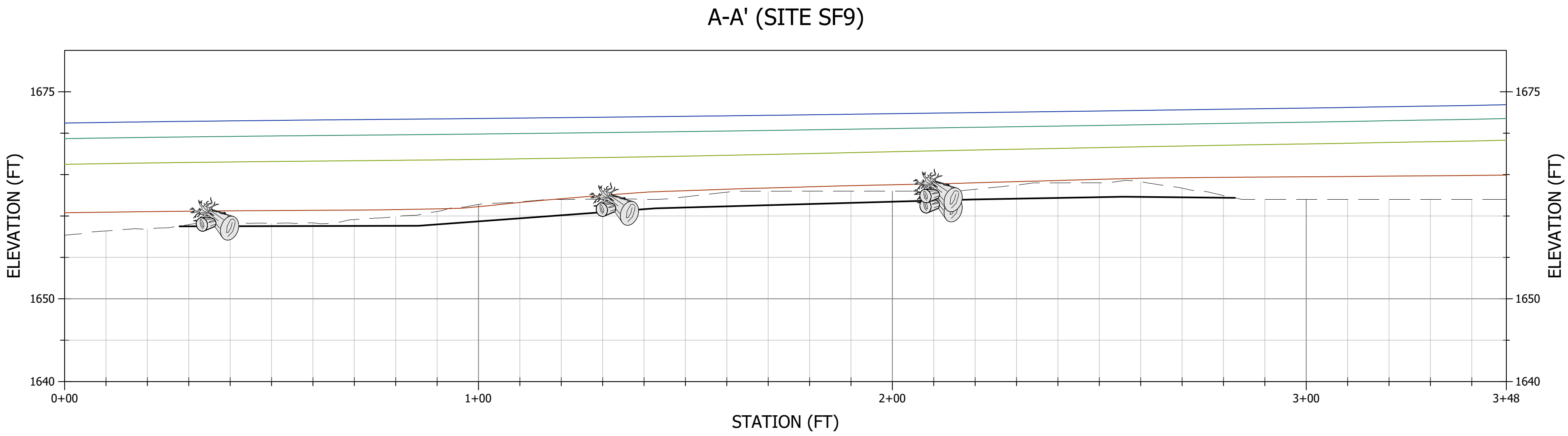
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APPROVED: ----



MATHEWS CREEK (MC) -  
REACH SF9

PLAN

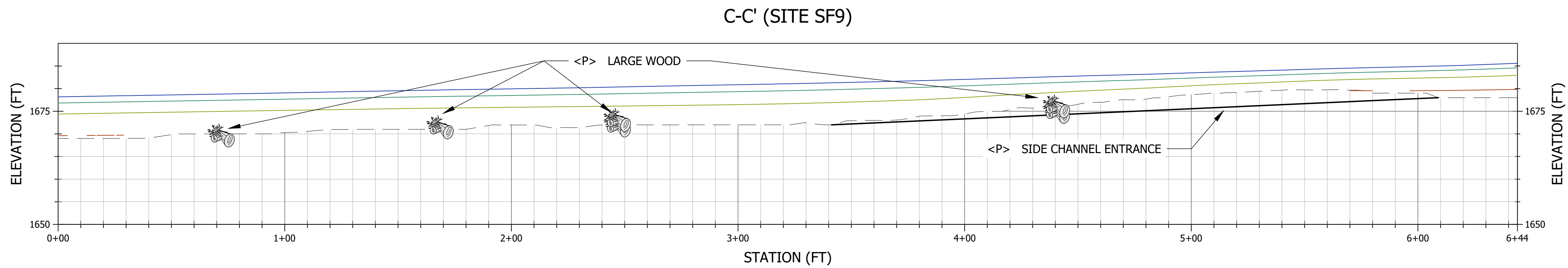




**LEGEND**

- EXISTING GROUND
- PROPOSED GROUND
- PROPOSED LARGE WOOD PLACEMENT
- 10-YR WATER SURFACE
- 5-YR WATER SURFACE
- 2-YR WATER SURFACE
- 20% EXCEEDANCE WATER SURFACE

**NOTE:** WATER SURFACE ELEVATIONS ARE EXISTING CONDITIONS BASED ON HYDRAULIC MODELING USING 2014 LIDAR.

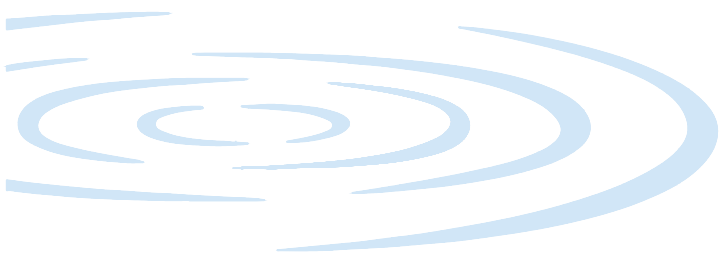


SALMON RIVER  
FLOODPLAIN HABITAT  
ENHANCEMENT PROJECT

SISKIYOU COUNTY, CA

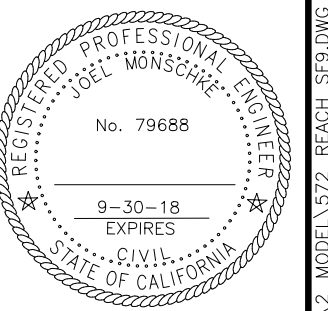
**Stillwater Sciences**

850 G ST, SUITE K  
ARCATA, CA 95521  
P: (707) 822-9607



SCALE: AS NOTED  
DATE: 9/4/2019

DESIGN: JS  
DRAWN: RT  
CHECKED: JM  
APPROVED: ----



MATHEWS CREEK (MC) -  
REACH SF9

PROFILES

SHEET 2 OF 2

LAST SAVED: 9/4/2019 9:42:19 AM PLOT DATE: 9/4/2019 PLOT STYLE: ----- IF BAR DOES NOT MEASURE IT DRAWING IS NOT TO SCALE -- ALWAYS ACCORDING





**DECISION MEMO**  
**WESTERN KLAMATH RESTORATION PARTNERSHIP**  
**PRIVATE LANDS FUELS TREATMENT PROJECT**  
**U.S. FOREST SERVICE**  
**SIX RIVERS NATIONAL FOREST**  
**T.6E R.14N SECTIONS 34 AND 35, T.6E R.13N SECTIONS 4, 5, 20, 21, 27, 28, 32, 33 AND**  
**T.6E R. 12N SECTIONS 4, 9, 10**  
**SISKIYOU COUNTY, CALIFORNIA**

**BACKGROUND**

In 2007, the Western Klamath Restoration Partnership (WKRP) invited Forest Service leadership to participate as a collaborator to achieve mutually beneficial, all-lands fire management and ecological restoration goals, building on a shared vision for restoring fire resilience at the landscape scale, founded upon Karuk tribal knowledge and practices and concepts outlined in the *National Cohesive Wildland Fire Management Strategy* (USDA 2014).

“The outcome of the cohesive strategy effort is more than a set of documents. It is a commitment to the doctrine that, as stakeholders, we all share responsibilities for managing our lands; protecting our nation’s natural, tribal, and cultural resources and making our communities safe and resilient for future generations.” –Tom Harbour, USFS

The WKRP Private Land Fuels Treatment Project represents the first phase in achieving the WKRP’s landscape Somes Bar Integrated Fire Management Project, aimed at strategically creating defensible space via fuels reduction to improve the resiliency of our forests across all lands. Properties and homes within this larger project area are currently at high risk of being significantly impacted by wildfires due to a century of fire exclusion and accumulation of fuels. Firefighters are assuming increasing risk to save people, properties and homes in a changing wildfire environment. Dispersed homesteads are surrounded by national forest lands with limited access and egress routes, increasing risk to landowners and firefighters alike. These private land homesteads are located within the Six Rivers NF Direct Protection Area (DPA). In the event of a wildfire, the Six Rivers NF is the agency responsible for initial attack on private land. Reducing hazardous fuels now will make a safer environment for initial attack responders in the future.

Recent fire events demonstrate continued fire exclusion and barriers to managing fire within its historic regime perpetuates risk to the public and fire management personnel. In light of risks to these local communities from wildfire, the Orleans/Somes Bar Community Wildfire Protection Plan (CWPP) identifies affected communities and strategies to promote firewise, fire-adapted communities.

In 2015, the Six Rivers National Forest fiscally supported members of the WKRP and the Mid Klamath Watershed Council to further CWPP fuels reduction objectives on private lands. These partners engaged landowners to plan fuel reduction work around their homes to incrementally realize fire-adapted communities, capable of withstanding wildfire without loss of life or property. Demonstrating community approaches to restoring the process and function of fire is also aimed at building trust and lasting relationships between community members, agencies and organizations concerning forest management and response to wildfires. The goal is to promote the ability of humans to plan for and adapt to living with fire. As these local economies are already depressed, any further loss of infrastructure or property would be difficult to recover in the event of a high severity wildfire.



## DECISION

I have decided to support the Orleans/Somes Bar Fire Safe Council (FSC) prescribed fire and manual fuels reduction treatments up to 645 acres of fourteen parcels of private land located north of Kennedy Creek and south to Rogers Creek over the next 10 years, consistent with the Orleans/Somes Bar Community Wildfire Protection Plan (CWPP). Multiple entries may be required to achieve the desired results. This decision does not authorize prescribed burning plans. The authority of approval is under the jurisdiction of the State of California and Cal Fire. This decision documents the effects of the environment from the fuels treatments described herein.

The FSC will oversee all aspects of implementation and liability, beginning with contacting land owners to develop a unique treatment plan for their property, tailored to their needs and unique environment circumstances. Where prior fuels reduction projects on private lands has sufficiently lowered concentrations of flammable woody material, the primary treatment may only require a single understory burn to achieve the desired condition. Where fuel loading is more concentrated and prone to carrying moderate to high intensity fire behavior, a combination of hand thinning and pruning of ladder fuels, chipping and jackpot burning of ground fuel concentrations may be required before implementing understory burning. If fuel concentrations are still too heavy after pre-treatment and burning, more follow-up treatments applying either understory burning, jackpot burning, handpile burning or chipping may be required to further treat scorched vegetative die off and needle cast to achieve the desired condition.

Where prescribed fire operations will be applied, existing defensible space features such as roads, trails, or natural vegetation breaks will be used to ensure containment. Where these features do not exist, manual fireline construction<sup>1</sup> will be required where necessary to ensure safe operations and prevent escape. The vegetation component of the project (hand thinning, chipping, etc.) could occur at any time of the year. Fuel treatments will occur in the fall when conditions allow for burning (as per Cal Fire permitting).

As part of contingency planning for fuels treatments as required under the CWPP, water tankers will be present during any burning operations. These tankers will tap into neighborhood hydrants as their primary water source and rarely use other sources. In the event water drafting from a stream is necessary, drafting locations will be from the mainstem of the Klamath River and will avoid drafting from the mouth of named tributaries, as these areas provide for critical cold water refugia in the fall. When drafting water tankers and pumps will use NMFS approved screening.

Fuels reduction treatment prescriptions are designed to manage surface fuels and raise crown base heights to avoid crown fire initiation (Agee and Skinner 2005) and reduce the risk of future stand replacing fire, while maintaining the diversity of species and age classes (where feasible) (DellaSalla et al. 2003, Brown et al. 2003). Trimming the branches 6 to 8 feet up the stem of the residual trees can reduce a future fire's ability to climb the "fuel ladder" and burn into the crowns of the overstory trees (Agee et al. 2000, Agee and Skinner 2005).

Where there are thickets of small trees and shrubs, thinning will most likely be warranted as a pre-treatment prior to applying prescribed fire to prevent "torching" of the overstory and protect desired residual tree species. In order to minimize the regrowth of fuel ladders in treated stands, this prescription aims to retain at least 60 percent overstory canopy closure (in areas where it exists) in conifer and mixed conifer/hardwood stands.

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<sup>1</sup> Manual fireline construction consists of scraping burnable material, 18-24 inches wide, down to bare mineral soil and will only remove brush and small diameter trees.

**Monitoring:** As part of the CWPP, a monitoring plan for all fuel reduction activities within the Orleans/Somes Bar community planning area will be developed and implemented through a multi-partner effort, including the Orleans/Somes Bar Fire Safe Council and the Mid Klamath Watershed Council. As part of this monitoring, all prescribed burns will be monitored for 72 hours to ensure no hot spots are left and there is no threat to containment. The CWPP also proposes effectiveness monitoring on projects throughout the planning area to determine if objectives were met.

## Fuel Treatment Descriptions

Hand thinning and pruning. Understory shrubs and mid-story small diameter ( $\leq 10''$ ) vegetation will be thinned by manually using hand operated power tools. Hand pruning of ladder fuels (the lower branches of live trees and dead wood leaning onto live trees up to 8 feet high) and thinning of understory trees and shrubs up to 10-inch DBH using hand-held power tools.

- Where mid-story trees consist of multiple trunks sprouted from a single base, one or two trunks will be selected to remain and the other trunks thinned.

Hand Piling. All material cut during hand thinning activities will be limited to 6'H x 6'W x 6'D piles. Piles will not be placed under the dripline of predominant trees or within 50 feet of perennial or intermittent streams.

Chipping. Chipping will generally occur along existing roads and will follow the same diameter restrictions as described in the hand thinning and pruning description.

- Chippers are required to stay on existing roads.

Understory, Jackpot and Hand Pile Burning. Understory burning is the controlled application of prescribed fire within a determined boundary (before or after pretreatment and to maintain conditions in the long term). Jackpot burning is burning only concentrations of fuels within a perimeter.

- Prescribed burning activities will occur when conditions are wet enough to minimize the impacts to overstory trees by keeping flame lengths to 6 feet or less.
- The burn-boss will direct the firing operation using a strip head fire technique, beginning at the top of a slope and moving downhill. Burns will be monitored for at least 72 hours.
- Large predominant trees and snags will have slash and the top layer of duff removed with hand tools to protect the roots and crowns.
- Prescribed burning will retain 50 to 90 percent of existing duff layer.

Handlines. Handlines are linear 18 to 24-inch-wide features where manual labor using hand tools scrape off duff and ground vegetation until bare mineral soils are exposed, acting to stop flames containing fire to within the prescribed burned perimeter.

- Handlines may be constructed within riparian reserves where necessary for resource protection.
- Handlines will be repaired post treatment (during mop up stage or before winter rains) to protect water quality by minimizing the risk of sedimentation.



## PROJECT DESIGN FEATURES AND MITIGATION MEASURES

Project design features and mitigation measures are required in order to avoid or minimize potential for adverse effects from authorized activities. In addition, no burning would occur when the smoke generated from these activities could inundate the elementary schools in Orleans and Somes Bar.

### Invasive Plant Species

The following invasive plant species are documented (in order of abundance) proximal to one or more of the private property parcels with particular association to roads and highway edges: Himalayan or Armenian blackberry, dyer's woad, yellow starthistle, French broom and scotch broom.

Consider cleaning chipper equipment after operating where invasive plants are present.

In planning fuel-treatment projects proximal to settings with invasive plants (e.g., road edges), consider the risk of invasive plants spreading into the treatment area. Where the risk of spread into the treatment area is moderate to high (e.g., invasive plant cover is relatively high along the road edge where treatment is planned to occur), incorporate design features to reduce the spread of invasive plants. For all methods of treatment, retain a vegetative buffer of native shrubs, trees and ground cover, between the road edge and the fuel-treatment area proper to reduce the risk of invasive plant spread into the interior of the fuel-management area. (BMP 2014)

Recommendation are described below.

- For manual/hand-removal treatments or mechanical treatments, remove only enough vegetation and ground cover in the treatment area to accomplish fuel management /resource objectives; retain patches of shrubs and ground cover.
- Himalayan/Armenian blackberry. Mechanical removal or burning shrubs when beginning to flower are the most effective ways of removing mature plants. If cut, pile and burn blackberry slash material where treated. *Control regrowth* with prescribed burning or repeated piling/burning on top of where blackberry was removed. Alternatively, goats or sheep can also be used to control sprouting canes and like burning, follow up treatments will be needed ([www.cal-ipc.org/ip/management/ipcw](http://www.cal-ipc.org/ip/management/ipcw)).
- Dyer's woad/marlahan mustard. Where occurrences are relatively small, manual treatment is recommended before plants flower. Dig to remove as much of the root system as possible. Dispose of treated material in burn pile. Given this species intolerance to shade, to reduce the incident of sprouting or germination of seed in the bank, apply chipped material to a depth of 6 to 10 inches after treating.

### Cultural Resources

The WKRP Private Property Fuels Reduction project activities fit the criteria for a screened undertaking category in the R5 Programmatic Agreement [Appendix D. 2.3(y)]: *"Activities to reduce hazardous fuels on private lands, funded in whole or in part using Forest Service grants, including educational and training efforts, hand treatments, mowing, chipping, pile burning, use of hand-held mechanized equipment, and all fuels treatments at private residences."* Recommended stipulations to consult with the Karuk Tribe are outlined.

### Fisheries and Water Quality

Fuels-reduction activities are permitted within and adjacent to perennially and intermittent stream where there is an accumulation of significant fuel loads or where a substantial reduction in plant species diversity has occurred. Mitigation measures will be applied to maintain existing canopy cover, protect water quality and fisheries habitat consistent with the Aquatic Conservation Strategy.

- Riparian Reserves for this project are designated as fish bearing (300 feet each side of active channel) and non-fish bearing (150 feet each side of the active channel).
- A 50-foot no-treatment buffer in riparian reserves will be maintained from each side of the active channel.
- No understory or jackpot burning ignition would occur within riparian reserves. However, ignition may occur within riparian reserves only when necessary to minimize fire intensity and/or the potential for burning material to roll down into the riparian reserve. Fire may be permitted to back down into riparian reserves.
- Large woody debris will be retained in the riparian reserves, unless a threat to immediately adjacent structures.
- No chipping will occur in riparian reserves.
- Vegetable-based bar and chain oils will be used to reduce the potential for water contamination associated with chainsaw use.
- Handlines may be constructed within riparian reserves where necessary for resource protection. Handlines will be repaired post treatment (during mop up stage or before winter rains) to protect water quality by minimizing the risk of sedimentation.
- No overstory trees or snags will be cut unless absolutely necessary to protect life and property.

#### **Water Quality/Soils**

- All understory and pile-burning prescriptions will be implemented under or after wet-weather conditions to protect soil productivity.
- Thinning activities should retain 50 percent of the existing duff mat.
- Burning prescriptions should maintain 50 to 90 percent ground cover in order to maintain soil productivity.

#### **Petroleum Product mitigation measures**

- All project equipment will be cleaned prior to use for petroleum accumulations, dirt and plant material (to prevent the spread of noxious weeds), and leaks repaired prior to entering the project area. Such equipment includes chippers and stationary power equipment (e.g., generators, Mach 3 water pumps, etc.).
- Store and fuel equipment in staging areas after daily use.
- Inspect daily for fluid leaks before leaving the staging area for operation.
- During project duration, clean equipment before operating a minimum of 200 feet away from any natural water body or areas that drain directly to streams or wetlands and as often as necessary during operation to remain grease free.
- Clean-up and disposal of spilled material are outlined in the spill containment plan.

#### **Wildlife**

- No overstory trees will be removed. Large diameter (predominant) trees would have debris raked back from the base of the tree and ladder fuels cleared prior to burning.
- Prescribed burning activities would occur when conditions are wet enough to minimize the impacts to overstory trees by keeping flame lengths to 6 feet or less.
- Hand piles will not be placed within the dripline of predominant trees.
- Hand pile areas will be limited to 6 feet in width, height and depth.



- Snags would be protected by pulling back excess fuel from the base wherever possible. In the unlikely event that a snag may pose a safety hazard to personnel during implementation, it would be felled and left on site.
- Large down wood debris would be maintained on site wherever possible.

This action is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The applicable category of actions is identified in agency procedures as category 36 CFR §220.6(d)(6) – *Timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than 1 mile of low standard road construction*. This category of action(s) is applicable because in addition to allowable actions aforementioned, the category also allows for “*Thinning or brush control to improve growth or to reduce fire hazard including the opening of an existing road to a dense timber stand*” and “*prescribed burning to reduce natural fuel build-up and improve plant vigor*.”<sup>2</sup>

I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. I took into account the following resource conditions identified in agency procedures and project file that should be considered in determining whether extraordinary circumstances might exist:

- **Federally listed threatened or endangered species or designated critical habitat.**

In accordance with Section 7(c) of the Endangered Species Act, Biological Assessments/Evaluations have been completed for threatened, endangered, and proposed species known or suspected to occur within the project area.

Wildlife. This project will have no effect to northern spotted owl (NSO), as no suitable NSO habitat will be removed or degraded as a result of implementing the project. Because treatments will occur immediately adjacent to private residences, it is likely any potential noise disturbance from this project will not exceed the normal year-round ambient noise levels. It is expected that because these areas have been inhabited for decades, wildlife has adapted to these conditions. Any potential noise disturbance from this project would not exceed ambient noise levels or cause disturbance to any species in these areas (WKRP Private Land Fuel Treatment Biological Assessment/Evaluation, Bettaso, 2016).

The project will have no effect on or NSO critical habitat or on the gray wolf.

Fish. Based on project design features and mitigation measures, the project will not result in sediment or petroleum delivery to the stream channel, alter vegetation such that bank stability, temperature or input of organic material are impacted. No heavy equipment will be used, and chippers will stay on existing roads.

Informal consultation with the National Marine Fisheries Service was initiated through the interagency Level 1 process. The Level 1 team determined that the project may affect but not likely to adversely affect coho salmon or their critical habitat. They issued a letter of concurrence with this determination on March 2, 2016. Direct, indirect and cumulative effects to coho salmon and critical habitat designations are addressed in the WKRP Private Lands Fuels Treatment Project Biological Assessment/Evaluation for fisheries (Cyr, 2016).

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<sup>2</sup> 36 CFR §220.6(d)(6)(iv)

Plants. No federally listed threatened or endangered plant species are known to occur within the planning area and none were found during botanical surveys of the project area (WKRP Private Land Fuel Treatment project, Biological Evaluation/Biological Assessment, Hoover, 2016).

- **Flood plains, wetlands, or municipal watersheds**

Floodplains. Executive Order 11988 provides direction to avoid adverse impacts associated with the occupancy and modification of floodplains. Floodplains are defined by this order as, "...the lowland and relatively flat areas that are adjoining inland and coastal waters, including flood prone areas of offshore islands, including at a minimum, that area subject to a one percent [100 year recurrence] or greater chance of flooding in any one year."

*A multi-disciplinary analysis of direct, indirect and cumulative effects including watershed specialists indicates there will be no cumulative watershed effects that could threaten impairment of short or long-term water quality conditions due to: (a) the low impact nature of treatments (hand work and low intensity understory or pile burning), (b) implementation of project design standards (for example, 10-inch-dbh fuel treatment), and (c) use of erosion and sediment control. Although some treatment areas occur within the 100-year floodplains, implementation of the project will not affect the function or capacity of the floodplain as no new structures nor demolition of old structures are proposed as part of this project.*

*Therefore, the project will not alter long-term function or capacity of floodplains that exist within the project boundary.*

Wetlands. Executive Order 11990 was developed to avoid adverse impacts associated with destruction or modification of wetlands. Wetlands are defined by this order as, "...areas inundated by surface or ground water with a frequency sufficient to support and under normal circumstances does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds."

*There are no wetlands or wet meadows within the proposed treatment areas; therefore there will be no significant effect to these resources.*

Municipal Watersheds. Municipal watersheds are defined in FSM 2542.05 as "A watershed that serves a public water system as defined in the Safe Drinking Water Act of 1974, as amended (42 USC §§ 300f, et seq.); or as defined in state safe drinking water statutes or regulations."

*There are no municipal watersheds within or adjacent to the project area; therefore there will be no significant effect to this resource.*

- **Congressionally designated areas such as wilderness, wilderness study areas, wild and scenic rivers or national recreation areas**

*There are no congressionally designated wilderness, wilderness study areas, wild and scenic rivers, or national recreation areas in the project area. By adhering to low-intensity prescribed fire and primarily manual practices coupled with application of mitigations aimed at minimizing direct and indirect effects, there will be no adverse effects to the adjacent Wild and Scenic River resources associated with segments of the Klamath River.*

- **American Indians and Alaska Native religious or cultural sites**

*Tribal consultation was initiated with the Karuk Tribe. No major concerns were raised by the Tribe.*



- **Archaeological sites, or historic properties or areas**

This Project falls under the provisions of the *Programmatic Agreement Among the USDA, Forest Service, Pacific Southwest Region (Region 5), California State Historic Preservation Officer, Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forests of the Pacific Southwest Region* (2013).

#### **Public Involvement**

This action was originally listed as a proposal on the Six Rivers National Forest Schedule of Proposed Actions on December 09, 2015 – Project #48270. Concurrently with publication in the SOPA, members of the public were informed of the project during the scoping period from December 14, 2015 to January 16, 2016<sup>3</sup> and invited to provide comments on the proposed action. During the scoping period, a project description was mailed to landowners adjacent to the project area and posted at the Orleans and Somes Bar Post Offices, the Orleans Market and the Salmon River Outpost.

No comments were received indicating potential for extraordinary circumstances.

#### **FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS**

This action is in accordance with the Federal Land Policy and Management Act of October 21, 1976 and amended National Forest Management Act of 1976, delegating the Forest Service the authority and responsibility for protection of resources and management of National Forest System lands. This action is in accordance with NEPA Implementation Regulations, 40 CFR 1501.2.

The requirements set forth by Section 106 of the National Historic Preservation Act of 1966, as amended, have been met by following the stipulations included in the 2013 Programmatic Agreement among the USDA Forest Service, Pacific Southwest Region (Region 5), California State Historic Preservation Officer, Nevada State Historic Preservation Officer, and The Advisory Council on Historic Preservation Regarding the Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forests of the Pacific Southwest Region. No adverse effect to historic properties is anticipated.

Clean Water Act. The project will be conducted in accordance with requirements of the Regional Water Quality Control Board, North Coast Region, to ensure compliance with the California Water Code and the Federal Clean Water Act and Porter-Cologne Water Quality Control Act. All streams will be managed in full compliance with the Basin Plan to achieve water quality goals and objectives.

Clean Air Act. The project will be conducted in accordance with the Clean Air Act, the conformity provisions of the Clean Air Act, California's Title 17 (Smoke Management Guidelines for Agricultural and Prescribed Burning), and local air pollution control district regulations.

#### **ADMINISTRATIVE REVIEW (APPEAL) OPPORTUNITIES**

The Forest Service no longer offers notice, comment or appeal opportunities pursuant to 36 CFR 215 for categorically excluded projects.

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<sup>3</sup> FSH 1909.15\_10





## IMPLEMENTATION DATE

Implementation of the Western Klamath Restoration Partnership Private Lands Fuels Treatment Project may occur immediately upon my issuance of this decision.

## CONTACT

For additional information, please contact Corrine Black (Project Leader, Six Rivers National Forest) at 707-441-3593 or Nolan Colegrove (District Ranger, Orleans Ranger District) at 530-627-3291.

**MERV GEORGE JR.**

Forest Supervisor  
Six Rivers National Forest

4-27-16

Date

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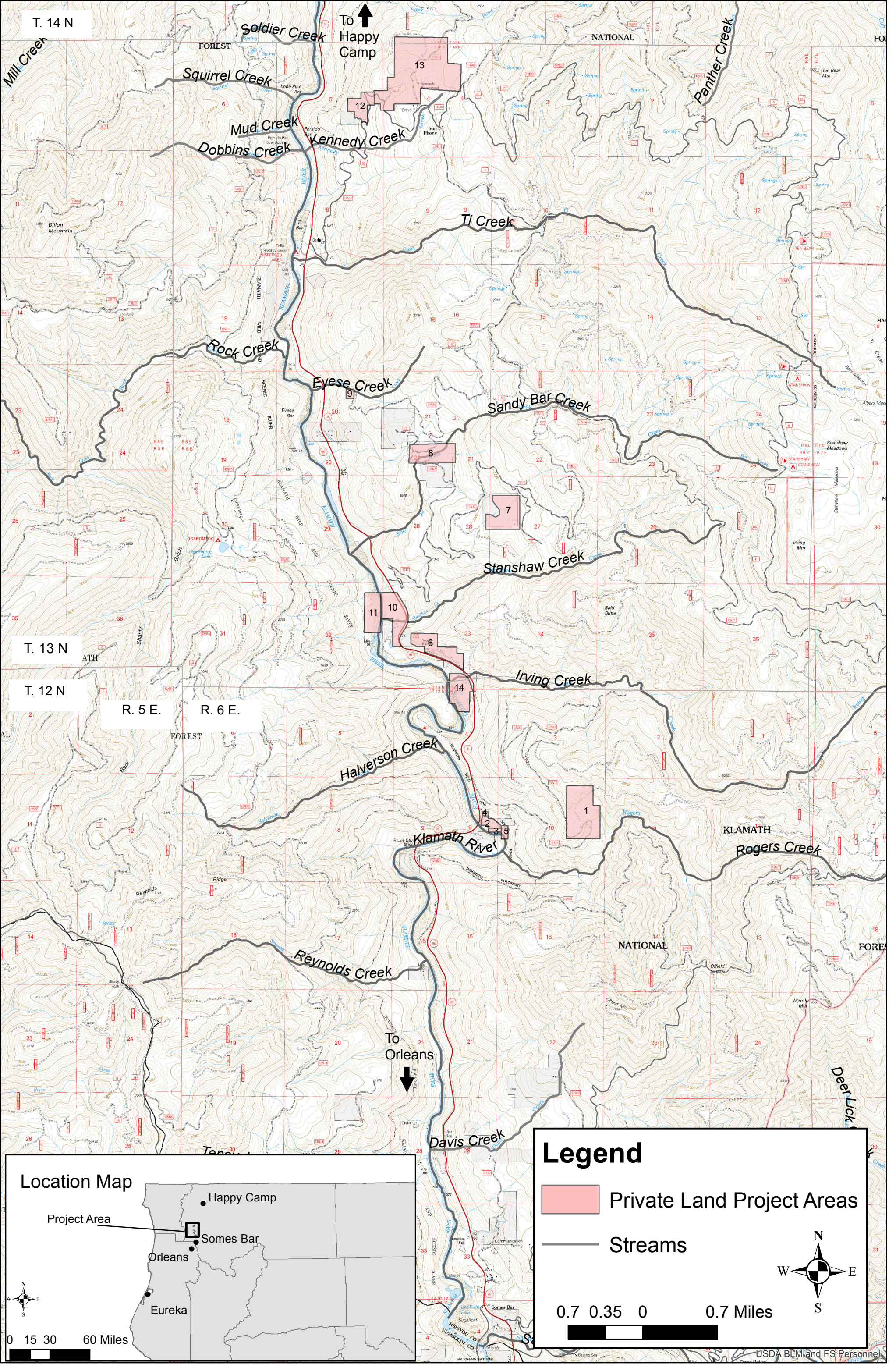
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*USDA is an equal opportunity provider, employer, and lender.*





# Private Land Fuel Treatment Project Area





## SCREENED UNDERTAKING

FY 2016

District & Management Unit: Orleans and Ukonom

Infra Number: R2016051000008

Six Rivers National Forest



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**Project Name:** WKRP Private Lands Fuels Reduction

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**Description of Project (as defined in 36 CFR Part 800.2[c]):**

Approximately 645 acres of private property is proposed for low-intensity prescribed fire, hand thinning, pruning, chipping, lop and scattering, hand piling, and pile burning. These actions are part of the larger Western Klamath Restoration Partnership (WKRP) project and are designed to create defensible space on private lands surrounded by National Forest System (NFS) lands. The proposed treatments will reduce fuel hazards adjacent to planned prescribed fire operations on nearby NFS lands. The treatments and actions will occur exclusively on private lands within or adjacent to three WKRP demonstration units: Rogers Creek, Patterson, and TiBar (Figure 1).

Specific treatments and proposed actions include:

- **Hand thinning and pruning:** Understory shrubs and mid-story small diameter ( $\leq 10''$ ) vegetation will be thinned by hand operated power tools (e.g. chain saws). Ladder fuels of overstory vegetation (the lower branches and dead wood leaning onto live trees) would be pruned from ground level up to 8 feet up the tree bowl. Small diameter ( $\leq 10''$ ) dead fuels on the ground will be cut and piled. Where mid-story trees consist of multiple trunks sprouted from a single base, one or two trunks will be selected to remain and the other trunks thinned.
  - **Hand Piling:** All material cut during hand thinning activities would be limited to 6' x 6' x 6' in size. Piles will not be placed under the dripline of predominant trees or within 50 feet of perennial or intermittent streams.
  - **Chipping:** Chipping would generally occur along existing roads and will follow the same diameter restrictions as described in the hand thinning and pruning description. Chippers will not be used off of existing roads.
  - **Understory, Jackpot and Hand Pile Burning:** Burning will occur on days with favorable atmospheric, weather, and fuels conditions to reduce risk of escapement and minimize flame lengths. Flame lengths would be limited to 6 feet. Large predominant trees and snags will have slash and the top layer of duff removed with hand tools to protect the roots and crowns.
- 

**Legal Location of the Project:**

The project area is in Siskiyou County, California and located on USGS 7.5' quadrangle maps: Dillon Mtn., Ukonom Mtn., Bark Shanty Gulch, and Somes Bar, CA.

T 14 N, R 6 E, sections 34 and 35.

T 13 N, R 6 E, sections 3, 4, 5, 8, 9, 15, 16, 17, 20, 21, 22, 27, 28, 29, 32, 33, and 34.

T 12 N, R 6 E, sections 2, 3, 4, 9, 10, 11, 14, 15, and 16.

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**Area of Potential Effect (APE) Description:** The area of potential effect (APE) is 645 acres of private property within and adjacent to NFS lands throughout the WKRP demonstration units. See Figures 2-4.

**Pre-field Review/Native American Ethnographic Information:**

A review of the Forest's GIS corporate layers showed the Rogers Creek demonstration unit lies within the northern border of the Katimiin Traditional Cultural Property (TCP) (Figure 5). One participating private lands parcel lies within the TCP, another slightly northeast of the boundary. The Katimiin TCP has not been formally evaluated nor nominated to the National Register of Historic Places (NRHP).

A Memorandum of Understanding (MOU) between the Karuk Tribe and the U.S.D.A. Forest Service, Six Rivers National Forest and Klamath National Forest was signed in 2012 to establish a working relationship between the government entities for active management in the Katimiin Cultural Management Area. Katimiin is the center of the Karuk Tribe's world. The Katimiin MOU states that "both the Tribe and the Forest Service recognize the importance and necessity of fire in the landscape as it relates to ecological processes and function". This project, as well as the larger WKRP project, fits within the framework specified in the Katimiin MOU.

The records search revealed that there have been several cultural resource inventory surveys near or on private lands participating in the fuels reduction project. A list of previous inventory surveys conducted in the APE is shown in Table 1. In 2015, a cultural resources inventory was conducted on NFS lands for the larger Western Klamath Restoration Partnership project; a final report on results is pending.

Previous surveys conducted on private lands did not document or record sites. Therefore, there are no previously recorded sites located in the APE. There is a high probability that some pre-contact and/or post-contact resources exist within the project area, such as food processing tools, historic homestead machinery or can dumps.

**Table 1: Previous Surveys in the APE**

Inventory Surveys	Land Ownership	Unit
R1992050511500- Pot Cabbage Timber Sale	private; NFS lands	TiBar
R2003051000955- Somes Bar RAC	private	Patterson
R2005051000986- Orleans-Somes Bar Fire Safe Council 2004	private; NFS lands	Patterson
R2006051001005- 2006 Somes Bar Sustainable Fuel Breaks Project	private	Adjacent to Patterson

Tables 2 and 3 list previously recorded sites and previous surveys in the vicinity of the private parcels in this project. The sites and surveys are outside of the APE but within a half-mile of the proposed activities.

**Table 2: Previously Recorded Sites Outside of APE: within ½ mile of proposed activities**

Site Number (05-05-)	Site Type	Determination of Eligibility	Unit
58-070 Somes Bar to Happy Camp Trail	Post-Contact	Unevaluated*	Rogers Creek
58-095 Log Structure	Post-Contact	Unevaluated*	Rogers Creek
58-098 Stewards Mining Claim	Post-Contact	Unevaluated*	Rogers Creek
58-026 Mano	Pre-Contact	Unevaluated*	Patterson
58-064 Stanshaw Trail	Post-Contact	Unevaluated*	Patterson
58-093 Eyese Cabin	Post-Contact	Unevaluated*	Patterson
58-094 Patterson Homestead	Post-Contact	Unevaluated*	Patterson
58-131 Lewis Cabin	Post-Contact	Unevaluated*	Patterson
58-206 Historic State Route 96	Post-Contact	Unevaluated*	Patterson
58-207 Historic Refuse	Post-Contact	Unevaluated*	Patterson
58-019 Strouss Cabin	Post-Contact	Unevaluated*	TiBar
58-029 Persido Cabin	Post-Contact	Unevaluated*	TiBar
58-066 Groundstone	Pre-Contact	Unevaluated*	TiBar
58-079 Strouss Homestead	Post-Contact	Unevaluated*	TiBar
58-080 Strouss Auto Parts	Post-Contact	Unevaluated*	TiBar
58-216 Logging Refuse Dump	Post-Contact	Ineligible	TiBar
58-217 Telephone Lines	Post-Contact	Unevaluated*	TiBar
58-070 Somes Bar to Happy Camp Trail	Post-Contact	Unevaluated*	Adj. to Rogers Creek
58-092 Water System and Spring Box	Post-Contact	Unevaluated*	Adj. to Patterson
58-130 Weakon Mine (Lost Cabin Mine)	Post-Contact	Unevaluated*	Adj. to Patterson
58-161 Fire Broken Cobbles	Post-Contact	Unevaluated*	Adj. to Patterson

\*Unevaluated sites are treated as potentially eligible for inclusion on the National Register of Historic Places



**Table 3: Previous Surveys Outside of APE: within ½ mile of proposed activities**

Inventory Surveys	Land Ownership	Unit(s)
R2003051000955- Somes Bar RAC	private	Patterson, Rogers Creek
R2005051000986- Orleans-Somes Bar Fire Safe Council 2004	private; NFS land	Patterson, Rogers Creek
R2015051000002- Roots and Shoots Prescribed Fire Project	NFS land	TiBar
R2015051000018- <i>pending; Western Klamath Restoration Partnership Project</i>	NFS land	All

**Results:**

There are no previously recorded sites in the APE. However, sites likely are present on these private parcels. Given the low impact of the manual fuels reduction treatments and low intensity fire, and absence of ground disturbing activities, no adverse effect to cultural resources is expected. In fact, it is anticipated that this fuels reduction project will be beneficial to sites and other cultural resources in the area as the purpose is to reduce the threat of high-severity wildfire.

There are twenty-one previously recorded sites located within a half-mile of the APE, most represent early homesteading activities along the Klamath River or travel routes. Only one has been evaluated for National Register of Historic Places (NRHP) inclusion, an historic logging refuse dump (FS site# 05-05-58-216) determined ineligible for listing on the NRHP. None of these sites will be impacted by this project.

**Consultation with Indian Tribes and Native American Traditional Practitioners:** On November 9, 2015, Six Rivers National Forest initiated formal consultation with the Karuk Tribe on the Western Klamath Restoration Partnership (WKRP) Private Property Fuels Reduction project. This project is exclusively on private property in the Somes Bar area. Merv George, Jr., Forest Supervisor, Six Rivers National Forest, sent the letter to Buster Attebery, Chairman, Karuk Tribe. In the letter, Mr. George asked if the Karuk Tribe had any concerns regarding the project, and specifically asked whether the project had the potential to impact traditional activities, practices, or beliefs.

On December 17, 2015, Alex Watts-Tobin, THPO, Karuk Tribe, sent a letter in support of the project to Merv George, Jr. Mr. Watts-Tobin stated that the Tribe would prefer that the project area be expanded beyond the 650 acres proposed. Mr. Watts-Tobin also stated that the Tribe would like for tribal consultation to be on-going during project design and implementation on private parcels as there is a high probability that cultural resources of importance to the Tribe are located within the project area.

On January 21, 2016, the letter from the Karuk Tribe regarding the WKRP Private Lands project was discussed during the quarterly Karuk-Forest Service Staff meeting in Orleans, CA. In attendance were Bill Tripp, Earl Crosby, and Alex Watts-Tobin, Department of Natural Resources, Karuk Tribe, and Nolan Colegrove, Orleans/Ukonom/Lower Trinity District Ranger, Jennifer Dyer, Heritage Program Manager, and Alyson Kral, Orleans/Ukonom/Lower Trinity District Archaeologist, Six Rivers National Forest. The Karuk Tribe was in support of the project and seemed comfortable that archaeological surveys were not required. It was discussed that the manual fuels reduction treatments had a low likelihood to harm sites that may be present on the private parcels. The Forest Service representatives agreed that it would be appropriate for the Forest to ask the Orleans/Somes Bar Fire Safe Council to consult with the Karuk Tribe during project design and implementation, as the Fire Safe Council will be the ones conducting the work.

**Screened Undertaking Category and Description:** Appendix D 2.3(y): "Activities to reduce hazardous fuels on private lands, funded in whole or in part using Forest Service grants, including educational and training efforts, hand treatments, mowing, chipping, pile burning, use of handheld mechanized equipment, and all fuels treatments at private residences."

**Stipulations:**

1. Six Rivers National Forest representatives will recommend to the Orleans/Somes Bar Fire Safe Council that they work closely and consult with the Karuk Tribe throughout the life of the project.
2. Six Rivers National Forest representatives will recommend to the Orleans/Somes Bar Fire Safe Council that they contact Alex Watts-Tobin, THPO, Karuk Tribe, prior to implementation.
3. The Orleans/Somes Bar Fire Safe Council utilizes the Community Wildfire Protection Plan for all of their projects. Six Rivers National Forest representatives will recommend to the Orleans/Somes Bar Fire Safe Council that they also refer to the Karuk Tribe's Eco-Cultural Resource Management Plan.

Prepared by: Alyson Kral Heritage Program Staff

Date: 01/26/2016

Approved by: Jennifer Dyer  
Jennifer Dyer

Forest Heritage Program Manager Date: 1-28-2016

This Screened Undertaking Form documents that I have reviewed the project proposal, and pursuant to the *Programmatic Agreement among the U.S.D.A Forest Service, Pacific Southwest Region (Region 5), California State Historic Preservation Officer, Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forests of the Pacific Southwest Region* (PA) I certify that the above project is a screened undertaking under terms of the PA (Stipulation 7.2, Appendix D 2.0 – Screened Undertakings) and can be implemented without further review.

**Attachments:**

**Figure 1:** Project Location Map

**Figure 2:** Area of Potential Effect (APE): Rogers Creek unit

**Figure 3:** Area of Potential Effect (APE): Patterson unit and adjacent properties

**Figure 4:** Area of Potential Effect (APE): TiBar unit

**Figure 5:** Previous Surveys and Known Sites: Rogers Creek unit

**Figure 6:** Previous Surveys and Known Sites: Patterson unit and adjacent properties

**Figure 7:** Previous Surveys and Known Sites: TiBar unit

**Tribal Consultation Documentation**