

The River Complex wildfire, and more specifically the Haypress fire, and the associated management-directed fire suppression actions taken during the “full suppression” activities, have left many patches of dead, standing dead and/or impacted trees killed or severely damaged by the fire. Furthermore, there are many post-fire management-felled, as well as naturally felled trees of all sizes, including large diameter (over 4 feet) logs along the historic roadway on Nation Forest Service land that connects the Big Flat Campground area (in T37N R9W Section 18) to a private inholding known as “Section 31” (formally T37N R9W S31.) The specific roadway designation appears to be 39N57 on the Motor Vehicle Use Map (MVUM) and is crucial to the property owners in Section 31.

Unfortunately, this crucial roadway is not identified as part of the proposed project in Appendix A. Maps of Project Areas of the “*Region 5 Post-Disturbance Hazardous Tree Management Project #60950*” (the Project). If this roadway is not repaired from fire-induced, as well as management-directed suppression and post-fire activities, a very dangerous situation will remain for property owners, first responders, service providers to Section 31, as well as the public.

This roadway has been in service since before the creation of the Forest Service. As early as the late 1850s as a trail, and subsequently as a road used by automobiles (as early as the 1930s,) this route was the primary, if not only, route to what is now the Section 31 inholding. The roadway pre-dates the Salmon Primitive Area, 1964 Wilderness Act, as well as subsequent expansions to the Trinity Alps Wilderness.

Excluding this existing, well-established roadway from the Project will not fully meet the “Purpose and Need of the Proposed Action” as described in the Scoping Report. Although the southerly portion of the roadway is not shown on the MVUM, it is frequently travelled by the public who accesses their private inholdings as well as maintenance workers and members of the community who provide goods and services to the private landowners.

To fully meet the Purpose and Need of the project, this roadway should be included and incorporated into the project. The Scoping Report described the Purpose and Need as:

- *“To provide for public health and safety ... **hazard trees may cause property damage, personal injury, or fatality in the event of a failure ... providing a safe environment for both public and the administrative use of affected roads, trails, and facilities is a priority for the Forest Service.** The Chief of the Forest Service and the Regional Forester stress that the **safety of the public and our employees is our central concern.** Identification and mitigation of hazard trees on NFS lands is necessary to fulfill the Agency’s mission.*
- *“A secondary purpose of the project is to reduce fuel loading. The project area has high densities of dead trees, especially in areas of high-severity burn. A recent study (Coppoletta et. al 2020) has shown that in areas that initially burned at high severity, **high densities of snags and downed woody fuels have potential for high severity burn in subsequent fires.** Leaving all hazard trees in place after felling them would increase downed woody fuel loading. **The increased fuel loading could extend resident burn times, increase flame length, increase fire heat and soil damage, increase firefighter labor to suppress the fire, block roadways, clog culverts and ditches, and present a safety threat to anyone using the roads, or recreation and administrative sites.** Removal of logs would reduce 10- and 100-hour fuel loading, reduce the severity and intensity of the next fire, and **create a safe defensible space for firefighters to try to stop future advancing fires.** Reducing the density of standing dead trees and removing activity-*

*generated downed woody material would reduce the chances of high-severity fire occurring along the roads within the project area, **create safe access for evacuation and allow emergency personnel to respond to incidents.***

By excluding the noted roadway, within the footprint of the Haypress wildfire of the River Complex, these specific goals will not be fully achieved.

It is imperative that safe passage through the NFS land is provided so that the frequent access by the owners of the inholdings in Section 31, as well as members of the servicing industries who support the owners of the parcels with goods, services, and maintenance activities, is retained – the roadway is crucial for the viability of these private lands, structures, and infrastructure improvements.

It is inherent to the mission of the Project that providing safe access through this portion of NFS land to the private inholding as well as reducing the chance of future high severity wildfires be achieved through this current proposed project, or through another project with the same or similar Purpose and Need as noted in the Scoping Report for this project, and within a similar timeframe.

In addition to the hazards created by the Haypress wildfire itself, this roadway was also significantly impacted in several areas due to the use of a dozer working under the direction of the Incident Management Team and Klamath NF to topple live and fire-killed trees several weeks after the wildfire passed through the area. This has left numerous large and small diameter logs along the roadway that will create significant fire hazards during future wildfire events in this area and may cause future erosion issues during wet seasons. The inevitable future significant weather events, such as rain-on-snow events, will significantly increase erosion and sedimentation in critical waterways and fisheries habitat.

Absent the inclusion of this roadway in this project, or a similar project with similar timeframe for implementation, a serious hazard to the public and private users of this roadway including community first responders, will remain. This hazardous situation will increase the risk of injury or fatality during the use of the roadway. A lack of action will result in increased hazardous fuel loading along the roadway, which will also increase the risk of injury or fatality to the road users and first responders during future wildfires, and certainly increase the risk of injury or fatality to firefighters assigned to suppress the inevitable future wildfires in this area.

The hazards created by not including this roadway will limit or exclude the use of this roadway as a ready-made fireline for future wildfires and/or future active forest management, including prescribed fire, to maintain a healthy forest structure and ecosystem integrity. It will also likely delay or limit the implementation of restoration goals, *both on the privately held lands as well as NFS lands*. Ecosystem restoration, where needed, will be important to maintain and improve the affected lands and associated critical habitats, with an intent to create and/or maintain ecosystem integrity, diversity, and resilience, particularly within the critical watershed of the South Fork Salmon River and its tributaries.

Having been provided this factual and critical information, we urge you to add this roadway to this Project.