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May 11, 2022

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1323 Club Drive  
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RE: Comments on Draft EAs for R5 Post-Disturbance Hazardous Tree Management Project

To the USFS Planning Team,

We appreciate the opportunity to provide comments on the Draft EAs for the Post-Disturbance Hazardous Tree Management Project. American Whitewater (AW) is a non-profit national river conservation organization founded in 1954 with a mission to protect and restore our nation's whitewater rivers and to enhance opportunities to enjoy them safely. As the primary advocate for the preservation and protection of whitewater rivers throughout the United States, our work connects the interests of human-powered recreational river users with ecological and science-based data to achieve our mission. California is exceptionally rich with whitewater rivers and more than 60% of the total mileage of its whitewater boating runs are located upon National Forest System Lands. A significant number of our members reside in or visit California and enjoy and use these exceptional whitewater rivers and are likely to be affected by this project.

Our primary concerns with this project relate to its potential impacts to streams and rivers including to water quality; scenery and aesthetics; and riparian and aquatic ecology. Additionally, we are concerned about how this project may affect designated and eligible Wild and Scenic Rivers (WSRs) as well as rivers not yet fully evaluated for eligibility.

It is apparent that the three EAs were prepared hastily and that they lack site-specific information and that proposed treatment areas have not been evaluated through field work. This, along with the omission of key specialist reports (e.g., fisheries, recreation, and scenery) and the incomplete nature of other reports and supporting documentation (e.g., watershed and hydrology reports) calls into question the sufficiency of the overall analysis. For a reviewer of the EAs, it is difficult to grasp key details about the project because the information is not

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*Our mission is to protect and restore America's whitewater rivers  
and to enhance opportunities to enjoy them safely.*

presented and may not exist at this time. Our comments based on the information currently available follow.

**Comment 1: The geographic extent of the project's treatment areas is unclear due to conflicting information in the EAs, supporting documents, and the project's GIS data and analysis. (All project zones)**

The project's proposed treatment areas are described identically on page 7 of each of the three EAs:

*"The area assessed for hazard tree abatement would be within 300 feet of the centerline of roads and trails (a 600-foot corridor), and around facilities and infrastructure."*

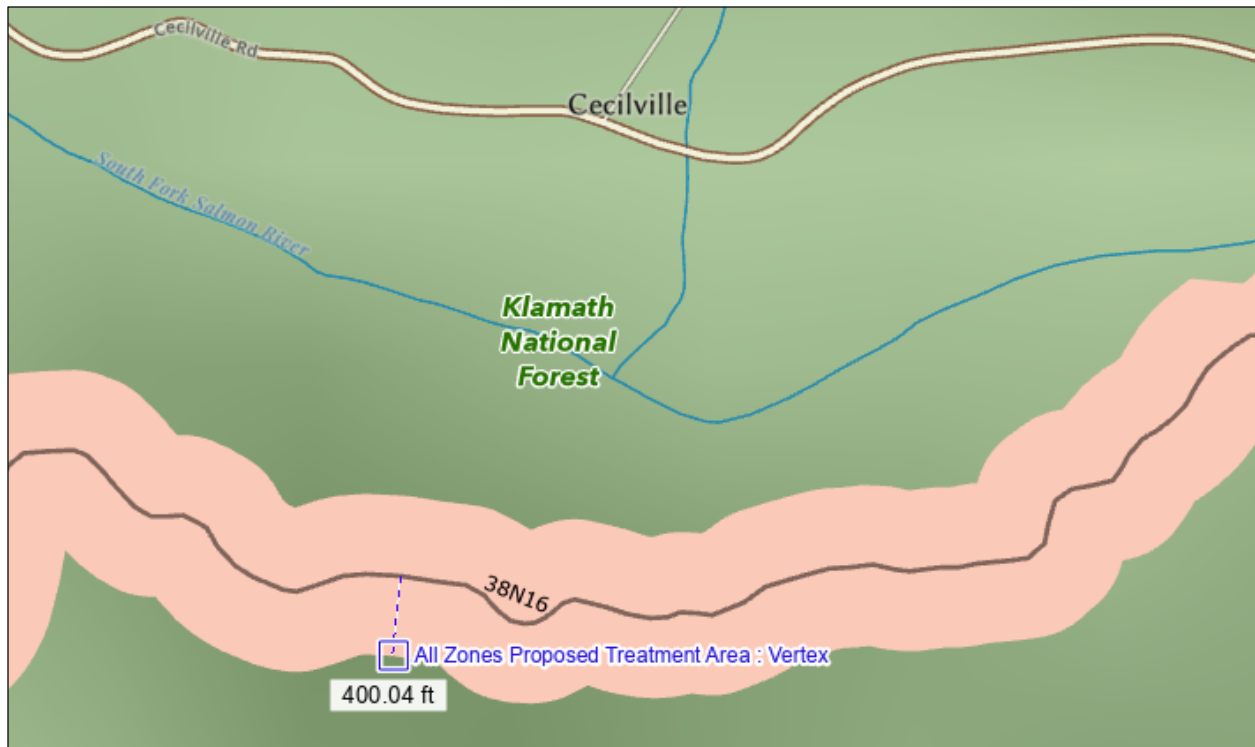
Throughout the EAs and supporting documents, the Forest Service consistently describes the treatment areas as being within 300 feet of selected features. However, the project's underlying GIS data for all three zones depict treatment areas that are within 400 feet of the centerline of roads and trails (an 800-foot corridor), and around facilities and infrastructure (see Map 1).<sup>1</sup> This is 33% larger than described in the text of the EAs and supporting documents.

Not only has the Forest Service mapped the treatment areas with a 400-foot buffer from selected features, but it has also used these larger treatment areas as the basis for analysis in all three EAs. For example, the treatment area values in Tables 2 on page 10 of each EA are based on a 400-foot buffer, not a 300-foot buffer. It appears that this GIS data was also used in several specialist reports and was likely used in modeling and analysis that is not directly presented in the EAs but that is part of the analysis and administrative record.

As such, the actual geographic extent of the proposed project is unclear. Is it 300 feet each side of selected roads, trails, and other features as the narrative text states or is it 400 feet each side as indicated by the GIS data and its derivative geospatial and quantitative analyses that are in the EAs and supporting documents?

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<sup>1</sup> The treatment areas are depicted in the project's GIS data within the ProposedTreatmentAreas.gdb geodatabase.



Map 1: Screenshot of GIS map with the measure tool showing a treatment area with a 400-foot buffer on each side of the Road 38N16 on Klamath (an 800-foot corridor). Although the EAs describe the treatment areas as being defined by a 300-foot buffer, the GIS data depicts a 400-foot buffer from selected roads, trails, and developed facilities on all three zones. GIS data obtained via the [project web page](#) on May 5, 2022.

This is a significant and foundational discrepancy that must be corrected. Because many, if not all, of the geospatial and quantitative analyses in the EAs and specialist reports utilize the GIS data with the 400-foot buffer, re-analyzing the project with the project’s stated 300-foot buffer will substantially change the content of the analyses, and it may be necessary to circulate corrected draft EAs for public comment.

**Comment 2: Project impacts to designated Wild and Scenic rivers are inadequately analyzed. (North and Central Sierra zones)**

Although several designated Wild and Scenic rivers (WSRs) are present within proposed treatment areas and project impacts are likely to affect river values, the EAs do not substantively analyze impacts to these rivers. In fact, the EAs for the two zones that contain designated WSRs within treatment areas (North and Central Sierra) do not identify these rivers at all. These two EAs dismiss impacts to WSR in a single sentence that is not backed by any substantive analysis and that does not fulfill the requirements of the Wild and Scenic Rivers Act (WSRA).

There are seven designated Wild and Scenic rivers within proposed treatment areas in the North and Central Sierra zones, totaling 12.6 miles across four different forests (see Table 1).

River Name	Classification	ORVs	River Miles in Treatment Area	Treatment Area Type	Forest Name	Zone
Middle Fork Feather River	Scenic	Fish, Historic, Recreation, Scenery	0.40	Road	Plumas	Central Sierra
Middle Fork Feather River	Scenic	Fish, Geologic, Historic, Recreation, Scenery	0.31	RecSite	Plumas	Central Sierra
Griffin Creek	Recreational	Fish, Geologic, Recreation, Scenery	2.44	Road	Six Rivers	North
Knopki Creek	Recreational	Fish, Geologic, Recreation, Scenery	3.04	Road	Six Rivers	North
Middle Fork Smith River	Recreational	Fish, Geologic, Recreation, Scenery	1.61	Road	Six Rivers	North
South Fork Salmon River	Scenic	Fish	1.14	Road	Klamath	North
South Fork Salmon River	Scenic	Fish	0.04	Trail	Klamath	North
North Fork Salmon River	Recreational	Fish	1.62	Road	Klamath	North
South Fork Salmon River	Recreational	Fish	0.01	Trail	Klamath	North
Trinity River	Recreational	Fish	1.04	RecSite	Shasta-Trinity	North
Trinity River	Recreational	Fish	0.73	Road	Shasta-Trinity	North
Trinity River	Recreational	Fish	0.25	Trail	Shasta-Trinity	North

Table 1: Designated Wild and Scenic rivers within proposed treatment areas. Data source for designated WSR rivers: <https://www.rivers.gov/mapping-gis.php>.

In addition to the mileage of the designated rivers, there are 1,798 acres of designated Wild and Scenic River corridor associated with these rivers that are also within proposed treatment areas as depicted in the project’s GIS data.

Although the Forest Service correctly identified the need to comply with the Wild and Scenic Rivers Act and agency directives in Forest Service Handbook 1909.12, Chapter 80, it baselessly dismisses the possibility that the project could affect these rivers:

*“The project will not affect Wild and Scenic River values because it is limited in scope and is focused in high-use roads within the recreational and scenic sections of the Wild and Scenic River designation.”* (North Zone EA at 50 & Central Sierra EA at 48.)

The Forest Service’s choice to not analyze and disclose impacts to WSRs is not supported by law, regulation, or policy. The agency’s assertion that the project will not affect river values because it is “limited in scope,” and “focused on high-use roads” does not fulfill the

requirements to take a hard look at potential impacts to WSRs and to manage the rivers in accordance with the WSRA.

With 12.6 miles of WSRs and 1,798 acres of WSR corridor within proposed treatment areas, the agency's claim that the project is limited in scope regarding WSRs is not substantiated. On the Six Rivers National Forest, 9.5% of the area proposed for treatment is within designated WSR corridors; on the Klamath National Forest, 3.1% of the area is within designated WSR corridors. This is not "limited in scope." The fact that the project has an enormous geographic footprint does not negate the possibility or significance of impacts to WSR within the project area nor does it allow the Forest Service to skip analysis and disclosure of impacts for the WSRs that are present.

The fact that the project focuses on "high-use roads" does not indicate that there may be no impacts to WSRs from the proposed treatments. (The project also focuses on trails and rec sites along WSRs.) Rather, the maintenance of roads—including roadside tree removal—is well known to cause impacts to water quality and waterways located downslope and downstream. The fact that the project focuses on roads *increases* the likelihood of adverse impacts to wild and scenic river values and is not a rational basis for determining that there would be no impacts. The WSRA requires the Forest Service to pay "[p]articular attention...to scheduled timber harvesting, road construction, and similar activities which might be contrary to the purposes of [the WSRA]." 16 U.S.C. 1283(a). For this project, the Forest Service has instead paid less attention to impacts to WSRs because the project involves timber cutting along roads; this is contrary to the law.

Further, the Forest Service is required by the WSRA to protect and enhance the river values of all WSRs, regardless of their classification, and the fact that the rivers in the proposed treatment areas are classified as scenic and recreational does not confer a lower standard of analysis for considering direct and adverse impacts to their values.

The Wild and Scenic Rivers Act (16 U.S.C. 1281 et seq.) is unambiguous in its requirement that the Forest Service administer each component, regardless of its classification, "in such manner as to protect and enhance the values which caused it to be included in said system." 16 U.S.C. 1281(a). These values, commonly referred to as "Wild and Scenic River values," include the outstandingly remarkable values (ORVs) for each designated river segment, the free-flowing condition of the river, and its water quality. See 16 U.S.C. 1271(b).

It is impossible for the Forest Service to have properly determined that the project will not affect Wild and Scenic River values without:

- 1) Identifying designated WSRs in the project area as well as any WSRs adjacent to or downstream of the project area that may be affected by the project,
- 2) Determining that the project would not affect the free-flowing condition of these WSRs,
- 3) Determining that the project protects the water quality of these WSRs, and
- 4) Determining that the project protects and enhances each of the outstandingly remarkable values of these WSRs.

The EAs include no such analysis of the project in relation to Wild and Scenic River values. There is no identification of the WSRs that are present and may be affected, there is no mention of ORVs, no determination of whether water quality is protected consistent with the WSRA requirement, and no determination of whether the project may affect the free-flowing condition of the WSRs that are present. All seven WSRs within proposed treatment areas include fisheries as an ORV, yet there is not even a fisheries specialist report as part of the project record, underlining the inadequacy of the analysis with respect to ORVs and other river values.

The WSRA also requires the Forest Service to place “primary emphasis” on protecting the “esthetic, scenic, historic, archeologic, and scientific features” of the rivers and their adjacent corridors. 16 U.S.C. 1281(a). The EAs contain no analysis of the project’s impacts to these criteria that is specific to the rivers and their corridors. Of note, the fires that affected each of the seven designated WSRs within the project area resulted from natural ignitions, and any resulting changes to aesthetics and scenery are part of a natural ecosystem process. As such, the burned state of riparian vegetation and forests is part of the river’s natural aesthetic and scenery and shall be managed and protected within accordance of the WSRA and applicable regulation, policy, and forest plan guidance.

The EAs omission of substantive analysis of project impacts to WSRs and their corridors is a glaring error and represents a significant legal deficiency in the EAs for the North and Central Sierra zones. A substantive analysis must be included in the final EAs along with all necessary mitigations and design features to ensure that the project will fully protect *and* enhance Wild and Scenic River values for all designated rivers in the project area or that may otherwise be affected by the project.

We recommend that the Forest Service eliminate or minimize the size of all treatment areas within designated Wild and Scenic corridors. Impacts to WSRs and river values can be significantly reduced by adopting a project design that considers the fact that trees on the

downhill side of roads do not need to be cut for as great a distance from the road as they do on the uphill side to achieve project objectives. Because all rivers are downhill of adjacent roads, this would provide the rivers with a greater spatial buffer from project activities and, in some cases, would keep the treatment areas outside of WSR corridors.

**Comment 3: Project impacts to eligible Wild and Scenic rivers are not analyzed. (All project zones)**

In addition to the requirements of the WSRA and Forest Service Handbook related to the management and protection of *designated* Wild and Scenic Rivers, the Forest Service is also required to protect rivers that have been found eligible or determined suitable for future designation. 36 CFR 219.10 and Forest Service Handbook 1909.12 Chapter 80.

Although rivers found eligible and/or suitable are present on all three project zones, none of the EAs address project impacts to these rivers.

There are 16 eligible and suitable Wild and Scenic rivers within proposed treatment areas in all three project zones, totaling 13.1 miles across six different forests (see Table 2).

River Name	Classification	Status	ORVs	River Miles in Treatment Area	Treatment Area Type	Forest Name	Zone
Little North Fork Middle Fork Feather	Wild	Eligible	Scenic, Botany, Recreational	3.05	Road	Plumas	Central Sierra
Little North Fork Middle Fork Feather	Wild	Eligible	Scenic, Botany, Recreational	0.73	Trail	Plumas	Central Sierra
Little Last Chance Creek	Recreational	Eligible	Scenic, Botany, Ecology	0.12	Range Fence	Plumas	Central Sierra
Little Last Chance Creek	Recreational	Eligible	Scenic, Botany, Ecology	0.05	RecSite	Plumas	Central Sierra
Little Last Chance Creek	Recreational	Eligible	Scenic, Botany, Ecology	0.30	Road	Plumas	Central Sierra
North Fork Feather River	Recreational	Eligible	Botany, Ecology	0.07	RecSite	Plumas	Central Sierra
North Fork Feather River	Recreational	Eligible	Botany, Ecology	0.93	Road	Plumas	Central Sierra
North Fork Feather River	Recreational	Eligible	Scenic, Cultural, Botany	0.07	RecSite	Plumas	Central Sierra
North Fork Feather River	Recreational	Eligible	Scenic, Cultural, Botany	0.17	Road	Plumas	Central Sierra
Yellow Creek	Wild	Eligible	Botany, Scenic, Recreational, Cultural, Fish	0.03	Road	Plumas	Central Sierra
East Branch North Fork Feather River	Recreational	Eligible	Scenic, Botany, Cultural	1.35	Road	Plumas	Central Sierra
Squaw Queen Creek	Recreational	Eligible	Botany, Cultural	0.41	Road	Plumas	Central Sierra
Indian Creek	Recreational	Eligible	Cultural, Geologic	0.19	RecSite	Plumas	Central Sierra
Indian Creek	Recreational	Eligible	Cultural, Geologic	0.03	Road	Plumas	Central Sierra

River Name	Classification	Status	ORVs	River Miles in Treatment Area	Treatment Area Type	Forest Name	Zone
Silver Creek	Scenic	Eligible	Ecology	0.42	Road	Plumas	Central Sierra
South Branch Middle Fork Feather River	Scenic	Eligible	Hydrology, Scenic	0.05	Road	Plumas	Central Sierra
South Branch Middle Fork Feather River	Wild	Eligible	Hydrology, Scenic	0.34	Road	Plumas	Central Sierra
Little North Fork Middle Fork Feather	Scenic	Eligible	Scenic, Botany, Recreational	0.05	Road	Plumas	Central Sierra
North Fork Feather River	Scenic	Eligible	Botany, Cultural, Scenic	0.04	Road	Plumas	Central Sierra
Thomes Creek	Wild	Eligible	Geologic, Scenic	0.33	Road	Mendocino	North
Elk Creek and tributaries	Scenic	Suitable	Geologic, Fish, Cultural	0.16	RecSite	Klamath	North
Elk Creek and tributaries	Scenic	Suitable	Geologic, Fish, Cultural	1.73	Road	Klamath	North
East Fork South Fork Salmon River	Recreational	Suitable	Wildlife, Fish	0.30	Road	Klamath	North
Elk Creek and tributaries	Recreational	Suitable	Geologic, Fish	0.05	Road	Klamath	North
South Fork Salmon River	Recreational	Suitable	Fish, Cultural	1.13	Road	Klamath	North
South Fork Salmon River	Recreational	Suitable	Fish, Cultural	0.05	Trail	Klamath	North
Cold Creek	Wild	Eligible	Fish, Scenic	0.19	Trail	Mendocino	North
Hayfork Creek	Scenic	Suitable	Scenic, Fish	0.09	Road	Shasta-Trinity	North
Hayfork Creek	Scenic	Suitable	Scenic, Fish	0.26	Trail	Shasta-Trinity	North
North Fork Tule	Wild	Eligible	Recreational	0.15	Road	Sequoia	Southern Sierra
Lone Pine Creek	Recreational	Eligible	Recreational, Scenic	0.29	Trail	Inyo	Southern Sierra

Table 2: Eligible and suitable Wild and Scenic rivers within proposed treatment areas. Data source for eligible/suitable rivers: <https://www.rivers.gov/mapping-qis.php>.

There are 4,793 acres of proposed treatment areas within ¼ mile of the centerline of these rivers. Eligible or suitable rivers do not have a Wild and Scenic corridor identified until they are designated; however, the area within ¼ mile of the centerline of these rivers is considered the interim corridor boundary until official corridor boundaries are established.

Forest Service-identified eligible and suitable rivers must be protected sufficiently to maintain their free-flowing condition and outstandingly remarkable values. Forest Service Handbook 1909.12 Chapter 80 (84.3). However, the EA has not identified any of these eligible or suitable rivers, much less analyzed the project’s impacts to them.

It is important to note that five of these eligible rivers are classified as *wild* and, consequently, any tree removal along these rivers may jeopardize the possibility of designating these rivers with a wild classification in the future. These rivers are listed in Table 2.



The EAs omission of substantive analysis of project impacts to eligible or suitable WSRs is a glaring error and represents a significant legal deficiency in the EAs for all three project zones. A substantive analysis must be included in the final EAs along with all appropriate mitigations and design features to ensure that the project will protect all ORVs for all eligible or suitable rivers.

We additionally recommend that the Forest Service remove all treatment areas along wild classified eligible rivers.

**Comment 4: Impacts to whitewater recreation are not evaluated, and there are no project design features to ensure that trees are not felled across and/or left in rivers and streams used by whitewater paddlers. (All project zones)**

The three EAs provide only a cursory review of recreation and no substantive evaluation of project’s effects to recreation resources.

Although all three project zones contain whitewater recreation resources, whitewater paddling is not even identified as a recreational activity that is present within the project area. There is no analysis of how the project may affect whitewater recreation resources.

American Whitewater’s [National Whitewater Inventory](#), the definitive database of whitewater boating information for the country, shows that there are 32 inventoried whitewater runs that intersect with the project’s proposed treatment areas across all three project zones, totaling 380 miles of boatable rivers (see Table 3). GIS data for these runs are available upon request.

River Name	Section	Miles	Class	River Info Link	Forest Name	Zone
Feather, Middle Fork	Bald Rock Canyon: Milsap Bar Bridge to Lake Oroville	7.6	V+	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, Middle Fork	Devils Canyon: Nelson Point to Milsap Bridge	33	V	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, Middle Fork	Sloat to Nelson Point	8	II-III	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, Middle Fork, South Branch	To confluence with Middle Fork Caribou to East Branch	5.1	V	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, N. Fork	Confluence	7.4	III+	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, N. Fork	Poe Dam to Poe Powerhouse	7	IV-V	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, N. Fork	Lake Almanor to Belden Forebay	10.9	V	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, N. Fork, E. Branch	Virgilia to Belden	10.5	III-V	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, S. Fork	Forbestown Diversion to Ponderosa Reservoir	5.5	IV-V	<a href="#">More Info</a>	Plumas	Central Sierra
Feather, S. Fork	Little Grass Valley Reservoir to South Fork Diversion Dam	9.2	IV-V	<a href="#">More Info</a>	Plumas	Central Sierra
Indian Creek (Feather trib)	Near Crescent Mills to Spanish Creek	7.3	IV-V(V+)	<a href="#">More Info</a>	Plumas	Central Sierra
Spanish Creek	Oakland Camp to East Branch NF Feather	10	II-III	<a href="#">More Info</a>	Plumas	Central Sierra

River Name	Section	Miles	Class	River Info Link	Forest Name	Zone
Beegum Creek	USFS Campground to State Highway 36	8	IV-V(V+)	<a href="#">More Info</a>	Shasta-Trinity	North
Coffee Creek	Coffee Creek Road to Trinity River	9.7	III-IV	<a href="#">More Info</a>	Shasta-Trinity	North
Eel	Horse Creek to Lake Pillsbury	18.1	IV-V	<a href="#">More Info</a>	Mendocino	North
Elk Creek	Norcross Campground to Klamath River	14	I-IV	<a href="#">More Info</a>	Klamath	North
Grindstone Creek	Grindstone Road to Road 306	12.2	III-IV	<a href="#">More Info</a>	Mendocino	North
Hayfork Creek	3 mi. W. of Hayfork to Hyampom	20.4	IV-V	<a href="#">More Info</a>	Shasta-Trinity	North
Sacramento	Dunsmuir to Castle Crags	8.4	III-IV	<a href="#">More Info</a>	Klamath	North
Sacramento	Sims Flat Campground to Lake Shasta	17.4	IV	<a href="#">More Info</a>	Shasta-Trinity	North
Salmon, N. Fork	Gallia to Forks of Salmon	10.4	III-V	<a href="#">More Info</a>	Klamath	North
Salmon, S. Fork	South Fork Gorge	5.6	IV-V	<a href="#">More Info</a>	Klamath	North
Salmon, S. Fork	Upper South Fork Run	9.6	III	<a href="#">More Info</a>	Klamath	North
Thomes Creek	Above Paskenta	21.3	IV-V+	<a href="#">More Info</a>	Mendocino	North
Trinity	Pigeon Point Campground to Cedar Flat	24.2	II-III	<a href="#">More Info</a>	Shasta-Trinity	North
Trinity	Tangle Blue Creek to Clair Engle Lake	13.8	III-IV	<a href="#">More Info</a>	Klamath	North
Big Creek (San Joaquin trib.)	Indian Pool to Huntington Lake	2.7	II-IV(V)	<a href="#">More Info</a>	Sierra	Southern Sierra
Granite Creek	Strawberry Mine to near Cassidy Trail	7	III-IV(V)	<a href="#">More Info</a>	Sierra	Southern Sierra
San Joaquin	Chawanakee Gorge (Dam 6 to Reddinger Reservoir)	8.3	V	<a href="#">More Info</a>	Sierra	Southern Sierra
San Joaquin	Mammoth Pool Dam to Mammoth Pool Powerhouse	9	IV-V	<a href="#">More Info</a>	Sierra	Southern Sierra
San Joaquin, S. Fork	Florence Lake to Mono Hot Springs	7.2	IV-V	<a href="#">More Info</a>	Sierra	Southern Sierra
San Joaquin, S. Fork	Mono Hot Springs to Middle Fork, to Mammoth Pool	30.9	V+	<a href="#">More Info</a>	Sierra	Southern Sierra

Table 3: Whitewater boating runs located within proposed treatment areas. Data source: American Whitewater's National Whitewater Inventory.

In our scoping comments submitted on November 15, 2021, we requested that trees not be felled into rivers because they are likely to pose substantial hazards to river users. The project design features in the draft EAs do not address this concern. This raises the possibility that trees will be felled into rivers, especially along riverside trails where the project objective is to cut trees but not remove them. There is no reason to not include a project design feature that protects river user's lives and safety by prohibiting the felling of trees into rivers and streams, and we request again that this concern be addressed. The 32 rivers that intersect proposed treatment areas are of particular concern (see Table 3).

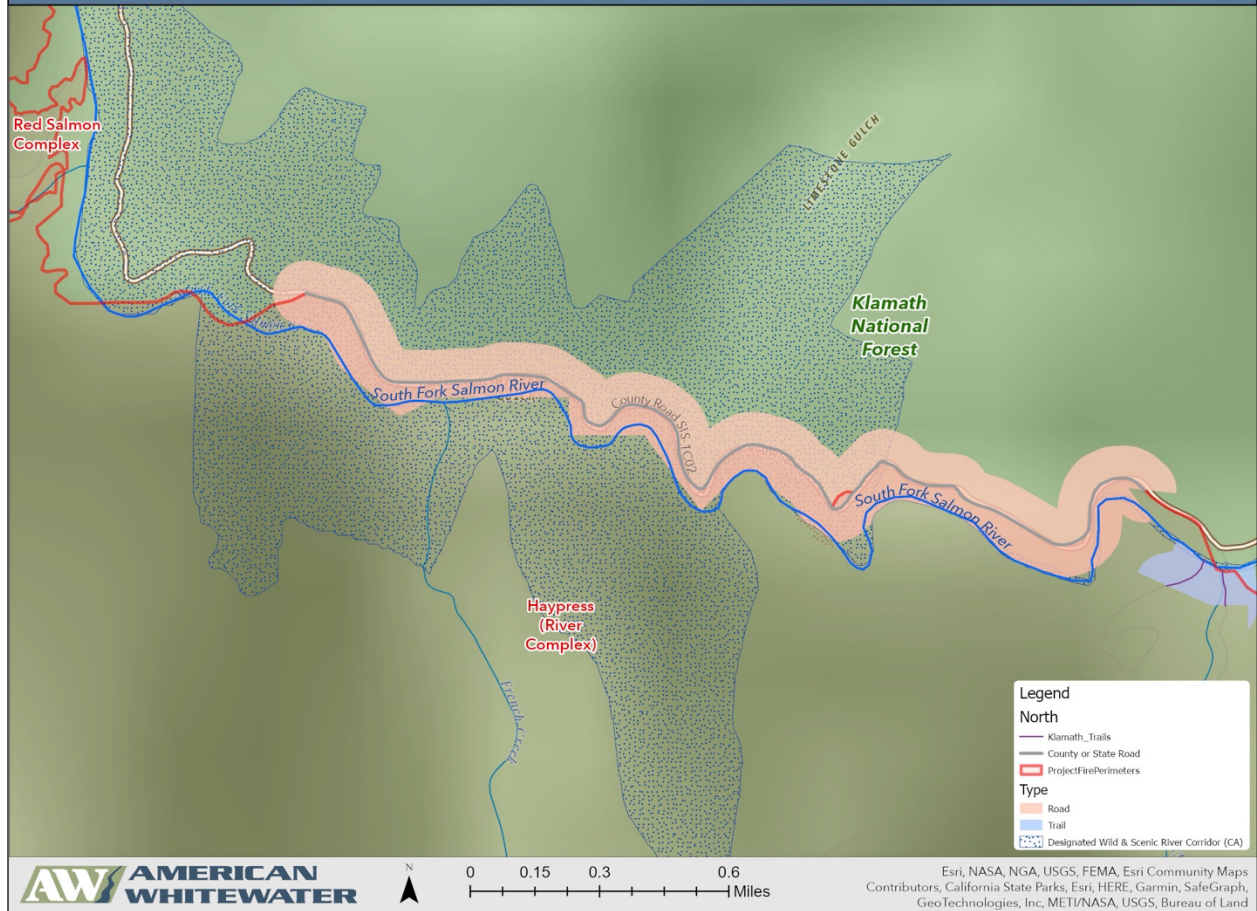
Comment 5: There is a mapping error in the project fire perimeters polygon for the 2021 River Complex (Haypress Fire) that results in a treatment area being placed is entirely outside of the fire footprint (and within the corridor of the designated Wild and Scenic South Fork Salmon River). (North Zone)

There is an error in the mapping of the northern edge of the 2021 Haypress Fire (River Complex) on the Klamath National Forest about 2.5 miles west of Cecilville, California along the South Fork Salmon River. The fire was contained along the south bank of the river but the fire perimeter polygon incorrectly shows the fire as having been contained along Cecilville Road (County Road SIS-1C02). The road is 200-500 feet to the north and uphill of the river. It appears that this mapping error occurred during the wildfire suppression effort, and it has not yet been corrected.

As a result of this error and the apparent lack of any ground-truthing of proposed treatment units, the Forest Service has proposed a sizable treatment area along Cecilville Road in an area that is entirely unaffected by recent fire (see Map 2 and Photo 1). The treatment area is located along a more than one mile of designated Wild and Scenic River and along a scenic roadway. There are no fire-killed or damaged trees in this treatment area because the fire did not burn within it, except for the approximately 6 acres that are located on the south side of the South Fork Salmon River.

The purpose of the project is to address post-disturbance hazard trees. Because there was no disturbance within this proposed treatment area and no hazard trees as a result, the unit should be removed from the project.

## Treatment Unit Located Entirely Outside Actual Fire Footprint



Map 2: Map of the proposed treatment area along Cecilville Road (Klamath NF, about 2.5 miles west of Cecilville, Calif.) that is located entirely outside of the fire footprint of the 2021 Haypress Fire (River Complex). The fire perimeter is incorrectly mapped. The actual northern edge of the fire perimeter is along the south bank of the South Fork Salmon River but the fire perimeter polygon in the project's GIS data depicts the fire as having extended northward to Cecilville Road. As a result, the project contains a treatment area that is, in reality, outside of the fire footprint entirely except for approximately six acres that are south on the river.





*Photo 1: View of the proposed treatment area, the South Fork Salmon River, and the 2021 Haypress Fire (River Complex) footprint, taken Sept. 18, 2021. This view is looking eastward from the western end of the proposed treatment area (see Map 1). The fire burned to the south side of the river (photo right) but it did not cross the river and its north side is unburned (photo left). The project's proposed treatment area is located entirely within this unburned area on the north side of the river (photo left).*

## Conclusion

Again, we appreciate the opportunity to comment on this proposed action.

In addition to the comments provided above, we are concerned that the Forest Service is pursuing an inappropriate pathway for environmental analysis and that it has pre-determined the outcome of the Finding of No Significant Impact decision. There is no rationale or information provided as to why this vast and significant project is expected to have no significant impact; this does not align with common sense or with history. The incomplete nature of the draft EAs and their supporting documents calls into question whether any reviewer can get a complete and accurate sense of the project and its impacts and whether the agency has taken the required hard look at environmental impacts. In its rush to move to implementation, the agency may be dooming itself to litigation that renders any action impossible. We question the chosen approach.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Scott Harding". The signature is written in a cursive, slightly slanted style.

Scott Harding  
Stewardship Associate  
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