

2021 Wildfire Roadside Danger Tree Mitigation Project (#62951) EA Comments

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Please accept the following comments for the 2021 Wildfire Roadside Danger Tree Mitigation Project (#62951).

Use of inconsistent Basal Area Mortality (BAM) criteria:

In the Purpose and Need for the 2022 Archie Creek Roadside Danger Tree Mitigation Project EA, the Forest Service defines moderate to high burn severity as greater than 50% BAM (2022 EA, pg 6) but for this project, this has been adjusted down: high BAM is > 50%, moderate BAM is now 25-50%, and low is less than 25% (2023 EA, pg 1). Why the inconsistency? This gives the appearance that the Forest Service is trying to remove trees that otherwise would not be removed under another project with similar circumstances.

BAM Accuracy:

In the case of the Jack Fire, it burned through the old perimeter of the 2002 Apple Fire. The 2021 Units found along Road 4720-005 burned at a moderate to high severity during the 2002 fire (attached Map 1). In the roughly 20 years since the Apple Fire, most of the returning vegetation has only achieved shrub or small tree height, and several stretches of this road were salvage logged in the years following the fire. This begs the question- what material could possibly threaten the road network here given its recent fire history and fire salvage history? I visited this area just a couple weeks before the Jack Fire happened and I'm including a two pairs of "before/after" photos as examples of the conditions.

Yes, there are a number of snags still present that were created by the Apple Fire but those trees have stood for the past 20 years and appear to be continuing that trend. I believe the units located along the first 7 miles of Road 4720-005 should be dropped from this project.

Inclusion of Non-Fire Impacted Trees:

Again, within the Jack Fire perimeter on Road 4720-005 a unit of "commercial harvest" has been proposed from approximately Milepost 7.71 to 8.30. The northern limit of this unit (around Milepost 7.71) includes forest that is not burned, and certainly did not encounter moderate to high BAM. The vibrant green trees can be seen in Photo 5 as they travel upslope from Road 4720-005 to the dividing ridge above. This area of commercial harvest should be adjusted to remove the initial section of healthy, functional forest.

Designate authority for danger tree evaluation:

On page 18 of the EA, it states that both the qualified Forest Service staff *and* Contractors will be identifying trees for treatment. As was the case with the Archie Creek Danger Tree Project, I would urge the Forest Service to NOT defer tree selection to contractors who have a conflict of interest to select large trees to increase their project margin. At a minimum, large trees identified by a contractor should require an additional approval by Forest Service staff before any action to remove the tree is taken.

Map 01. Jack Fire Before / After Photos

Key to Features:

-  2002 Apple Creek Fire Perimeter
-  2021 Jack Fire Perimeter

Forest Service Roads

-  Open Roads
-  Closed Roads

2002 Apple Fire Burn Severity

-  Unburned - Low
-  Low
-  Moderate
-  High

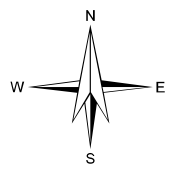


PHOTO 1:
June 2021

PHOTO 2:
October 2022

PHOTO 3: June 2021
PHOTO 4: October 2022

PHOTO 5:
October 2022

Apple Fire Salvage Sale Units

-  Apple Crsip
-  Big Apple
-  Crab Apple
-  Fried Apple
-  Last Apple



Photo 1: Looking East from Road 4720-005 Milepost 4.493 (June 2021)



Photo 2: Looking Northeast from Road 4720-005 Milepost 4.904 (October 2022)



Photo 3: Looking North from Road 4720-005 Milepost 6.605 (June 2021)

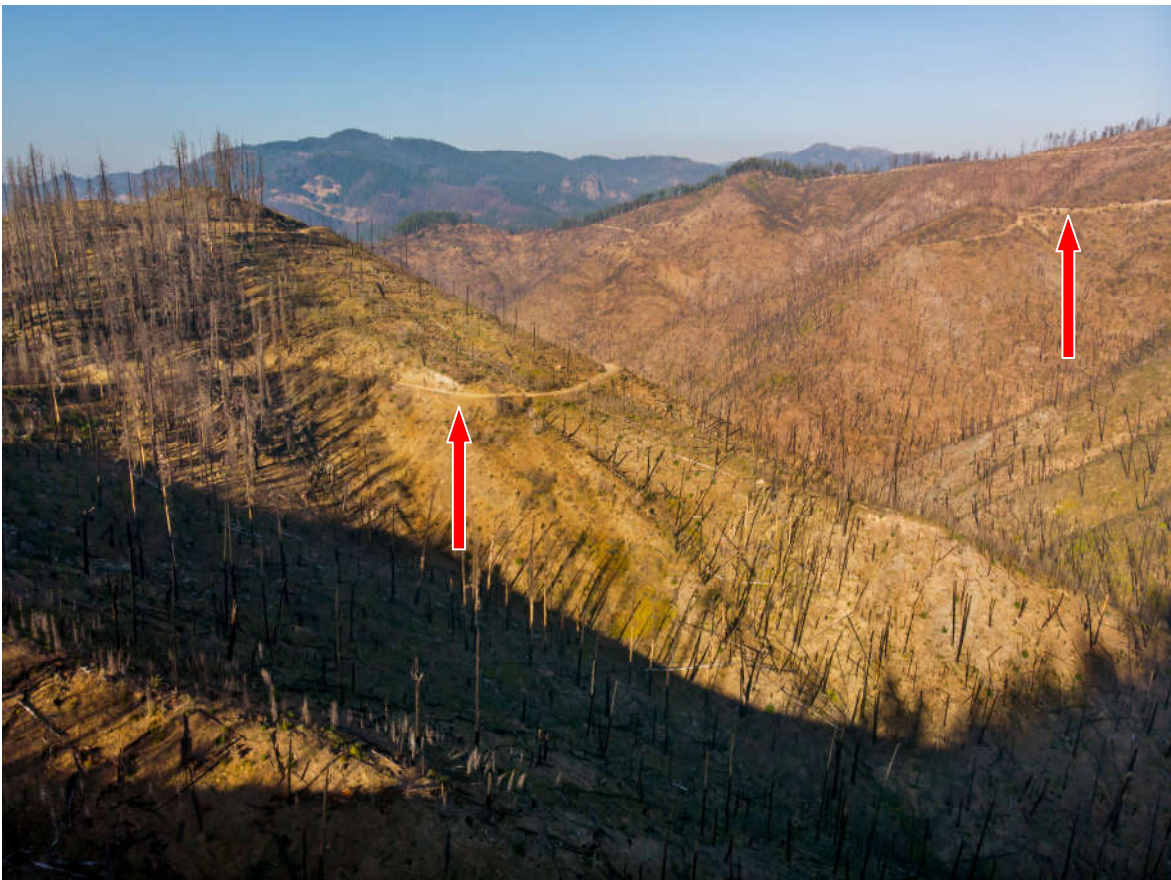


Photo 4: Looking North from Road 4720-005 Milepost 6.605 (June 2021)



Photo 5. Looking North from Road 4720-005 Milepost 8.289 (October 2022). Red arrow indicates Milepost 7.946 where the healthy forest changes to BAM.