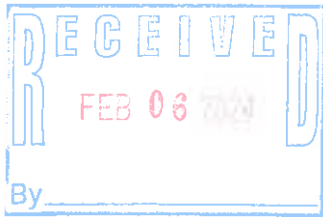
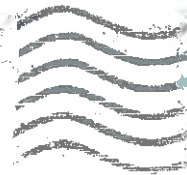




Administration Office
County of Siskiyou
1312 Fairlane Rd, Suite 1
Yreka, CA 96032

SACRAMENTO CA 957

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Regional Forester, Region 6
U.S. Forest Service
Attn: Northwest Forest Plan Comments
1220 SW 3rd Ave.
Portland, OR 97204

97204-282599





COUNTY OF SISKIYOU

Board of Supervisors

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February 1, 2024

Regional Forester, Region 6
U.S. Forest Service
ATTN: Northwest Forest Plan Comments
1220 SW 3RD Ave.
Portland, OR 97204

Subject: County of Siskiyou Comments - Northwest Forest Plan Amendment #64745

To Whom it May Concern:

The Siskiyou County Board of Supervisors is writing this letter to provide comments on the Forest Service's proposed amendment to the Northwest Forest Plan (NWFP). We hope that through this Amendment and the comments received that the Forest Service takes advantage of this opportunity to improve the management of our federal lands to support our communities, wildlife, environment, and economy. There are five National Forests in Siskiyou County including the Klamath, Shasta-Trinity, Modoc, Six Rivers, and the Rogue-Siskiyou National Forests. These Forests comprise sixty percent of the County and federal forest management directly impacts the surrounding communities and residents.

In reviewing the various components of the NWFP, much of the area available for active forest management across the entire landscape covered by the NWFP (which includes Siskiyou County) is overlaid with multiple conflicting objectives and land designations. Conflicting and constraining objectives reduce the Forest Service's ability to implement the 7.4 million acres of treatment needed to reduce density, restore forests and further fragments natural ecosystem function. An additional sixty-five percent of land in the NWFP area (17.8 million acres) lacks historical structural diversity and resilience. A similar trend can be clearly identified when you narrow down to the forested landscapes in Siskiyou County.

To change the current deforestation trajectory and to increase fire resistance and reduce impacts associated with climate change, the Forest Service should amend the NWFP to expand opportunities for active management across all artificial land designations, such as Matrix or Late Successional Reserves to support forest and community health. Other conflicting direction including the Roadless

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area designations, adaptive management areas, and Northern Spotted Owl critical habitat should be reconsidered due to the lack of historical and structural diversity in these forests and the current threats to habitat management, ecological integrity, and fire and fuels. The Forest Service should leverage data on recent fires and predictive models throughout Siskiyou County to identify where strategic wildfire-risk mitigation would be most effective and develop alternatives that reflect where the need is greatest.

The Bioregional Assessment of the NWFP identifies increasing threats to areas covered by the Plan, which include invasive species, uncharacteristically severe wildfire, and climate change. The residents of Siskiyou County have already experienced the impact of these threats first hand. The five-year average for acres burned by wildfire across the County is 1.7 million acres. In 2022, a total of 2.5 million acres burned. Since 2020, beginning with the Slater Fire, Siskiyou County has expended in excess of \$1.7 million on wildfire related costs. This severity and cost of wildfire is unsustainable and forest resources are being lost at an alarming rate. In many cases some of the areas previously burned have burned again due to the large amount of existing standing and down fuel left from previous fires.

The impacts of these fires cannot be overstated and not only do they affect the forest, but they have serious health impacts to residents from long-duration fire and smoke exposure. Road access to communities is impacted for years due to unstable slopes and landslides post-fire. Smoke exposure affects agricultural production by reduced crop yields and reduced product values. Recreation impacts include hazardous hiking and trail conditions, vast areas of burned landscapes and road wash outs. Water quality impairments negatively affect special use permits for fishing and other activities. In addition, forest closures last for months on end, impacting outfitter and guides services.

After a wildfire, the Forest Service is often unable to remove the hazardous fuels and dead trees, as well as hazard trees along forest roads. The recent Hazard Tree Environmental Assessment for Region 5 took two years to complete. Although there are emergency authorities available, the process is cumbersome and does not allow for timely hazard tree removal. The NWFP amendment should provide emergency authority after wildfires to treat hazardous fuels and thereby ensure safe access on public lands for firefighters, first responders and the public at large. Siskiyou County recommends that the amendment should have specific language which allows for restorative treatments post-fire that include reforestation, salvage logging, and thinning. It is critical that key infrastructure and roads have hazardous fuels removed immediately after wildfires. Leaving standing dead trees adjacent to roads for years at a time only transfers the risk to residents that may use these roads to get to work, school bus routes, and other routine activities. Hazard trees also impact recreational access to areas that may not have burned.

Burned areas that are left untreated often leave large swaths of burned trees near private lands and critical infrastructure. By not treating these areas the Forest Service transfers the risk of future fires to those resources and assets. Within Siskiyou County there is checkerboard ownership and extensive critical infrastructure including powerlines, interstates, and communication sites. This

infrastructure should be included in any post-fire recommendations as well as efforts to prioritize treatment areas prior to wildfire. Reforestation of burned areas will provide for younger forests and allow for higher carbon sequestration. The Forest Service should promote the development of forests of all age classes, especially younger forests that sequester carbon at high rates. Through responsible timber harvest, carbon can also be stored in long-lived wood products that are made right here in the region.

Siskiyou County is concerned with the extensive build-up of flammable vegetation, increasingly dense forest and predicted climate impacts to the Klamath and Cascade Mountains. The combination of wildfires impacts, over dense forests, and insect and disease continue to adversely impact the communities and residents of Siskiyou County. Current Forest Land and Resource Management Plans, and the NWFP itself, are incompatible with the necessary direction needed to achieve ecologically resilient landscapes. Immediate measures should be taken to clarify and prioritize risk reduction treatments, revise land use allocations to support management activities, and to reduce risk around critical infrastructure and communities. The definition of risk needs to include risk posed to communities in addition to ecosystem integrity. In the past, risk reduction actions in Late Successional Reserves have been narrowly defined to focus on single species.

Forest Service roads are also at risk from wildfires. Currently, the Forest Service has not been funded to maintain roads and with less timber removal many roads are impassable and causing impacts to water quality and aquatic species. In order to create climate resilience, the NWFP amendment has to include opportunities to maintain the Forest road system to allow for needed access while reducing impacts to other resources. Access is critical for recreation, timber removal, fire suppression, fuel reduction, private land and Tribal access.

Given the dire situation it is important to incorporate communities into proactive wildfire risk mitigation. We recommend that to reduce risk to residents, communities, and forests, that necessary restorative treatments be prioritized around communities, key infrastructure, and priority access routes to ensure firefighter and first responder safety. The NWFP amendment should ensure compatibility with the Wildfire Crisis Strategy and target fuel reduction in and around communities. Land designations, such as Late Successional Reserves, prevent active treatment near communities which increases the risk to homeowners and residents. The NWFP amendment should incorporate refugia concepts in designing restorative treatment objectives that can be implemented. Wildfire Crisis funding should be provided so immediate work can begin on strategic treatments to change the trajectory of wildfire risks across the five National Forests within Siskiyou County.

Current information on Mature and Old Growth forests indicates that there has been a loss of 5.5 million acres of Mature and Old Growth Forest with the greatest majority of this being lost to wildfire (3.2 million acres), followed by insect and disease, and approximately 200,000 acres being treated through forest management. The staggering loss of Mature and Old Growth Forest through fire and disease should result in timely, targeted active management that reduces fire and insect risk through appropriate treatment of these forests. Active management will help to ensure the

durability and persistence of Mature and Old Growth forests while protecting other values including community safety, sustainable recreation, and wildlife habitat. Under present conditions many dry forests lack the necessary resilience to persist for future generations due to ingrowth of other species that are not fire adapted.

The Forest Service should emphasize landscape-scale treatments across all land use allocations to reduce fuels through thinning and prescribed fire. Siskiyou County recommends the NWFP amendment reflect the changed conditions and focus actions on restoring forests with specific emphasis on the dry forests (frequent fire) which are at greatest risk. Land use allocations that were relevant in 1994 may no longer reflect the current conditions and the reserve system nomenclature can confuse the public on intent. With changes to land use allocations and/or explicit change to standards and guidelines, the Forest Service can implement the necessary treatments that promote greater heterogeneity in the dry forests where historical fire regimes have been changed. Forest managers need to be able to implement a suite of treatments which are most appropriate at a landscape scale to restore fire resilience and ecological integrity. The Forest Service should include in the amendment strategies for active management, sustainable use, and conservation of these areas. Specific language and direction on dry and moist forest conditions need to be included in the amendment to clearly state desired conditions and standards for achieving those conditions. Updating of habitat management approaches that reflect new findings on species interactions and habitat requirements will help to inform the public of the trade-offs.

Riparian reserves vary tremendously across the NWFP area. The amendment should reflect the drier riparian reserves and update guidance that looks more holistically at desired condition across the landscape. Additionally, riparian reserves throughout the NWFP area may need some restorative treatments and the amendment provides an opportunity to include additional treatments that benefit the ecosystem function.

Recreational expectations that were identified in the NWFP were not realized in all areas. Many communities still struggle to provide needed services, maintain viable populations, and attract new residents. Current forest conditions with overstocked stands and one-way in and out recreational facilities put recreationists at risk. The NWFP amendment should include options to increase recreational sustainability so trails and facilities are more resilient to risk of fires and post-fire impacts are reduced. Fuels reduction treatments must be targeted in areas to provide safe ingress and egress.

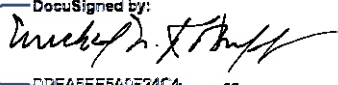
Adequate timber supplies have continued to fall throughout Siskiyou which has further reduced the overall workforce. Between 1984 and 1988, the County's average annual timber harvest was 538 million board feet, of which 50% was off of federal lands. Between 2004 and 2008, after the 1994 listing of the Northern Spotted Owl as federally endangered, the County's average timber harvest was 208 million board feet, only 18% of which came from federal lands. In 1990, the County had 871 wood product manufacturing jobs at 14 facilities, and wood products accounted for 78% of the County's manufacturing employment. In 2008, the County had only 355 wood products

manufacturing jobs at seven facilities, and wood products accounted for 42% of the total manufacturing employment. At this time, it is important to focus on rebuilding with a skilled workforce that is ready to take on the challenges identified including appropriate wildfire-risk mitigation, restoring forest and fire resilience, and protecting communities throughout the County. The amount of small diameter timber that should be removed from the surrounding forests could provide options for various business and enterprises. However, without a reliable timber supply many businesses can't succeed.

The Forest Service should honor the promise of the NWFP by providing reliable and predictable timber supply to support our region's forest sector, which also helps federal agencies achieve their conservation goals through wildfire mitigation, wildlife habitat enhancement and other benefits. In closing, Siskiyou County would like to note that given that National Forests amount to almost two-thirds of Siskiyou County's land base, it is critically important that the Forest Service and County work together to insure that their respective plans and projects are as consistent as possible through the coordination required by the National Forest Management Act, 16 U.S.C. § 1604(a), as well as the National Environmental Policy Act (NEPA) in 42 USC §4331.

We appreciate the opportunity to comment on the proposed amendment to the NWFP, and we will continue to provide comments as the amendment is further developed. If you have any questions, please contact Elizabeth Nielsen, Deputy County Administrator, at enielsen@co.siskiyou.ca.us or (530) 842-8012.

Sincerely,

DocuSigned by:

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Michael N. Kobseff
Chair, Board of Supervisors