

February 7, 2025

Shasta-Trinity National Forest Southfork Management Unit District Ranger Tara Jones 111 Trinity Street Hayfork CA, 96041 Sent via webpage portal

RE: Hyampom Community Wildfire Risk Reduction Project Draft Environmental Assessment

Dear District Ranger Jones,

Please accept these comments for the Hyampom Community Wildfire Risk Reduction Project Draft Environmental Analysis on behalf of the Environmental Protection Information Center, the Northcoast Environmental Center, and Safe Alternatives for our Forest Environment (S.A.F.E.). Our organizations represent over 35,000 members and supporters, who care deeply about protecting the wild places and rivers of California, particularly the South Fork Trinity River and the watersheds surrounding Hyampom.

The 12,415 acre project proposes three types of treatment: A. Fuel Management Zones or FMZs (3,179 acres,); B. Plantation Thinning (4,396 acres) and; C. Fuel Modification and Prescribed Fire. Land allocations include: 9,348 acres in Adaptive Management Area; 2,128 acres in Administratively Withdrawn Areas; 920 acres in Late Successional Reserves and; 18 acres in Matrix. Approximately 500 acres of FMZs and 600 acres of Plantation thinning are within Riparian Reserves. Up to 3 miles of "temporary" roads are proposed and an undisclosed number of landings. Hyampom Fire/Fuels Effects Analysis



Figure 3: Potential Operation Delineation Boundaries alignment with Treatment A and project area. Data was retrieved from RMA dashboard.

We appreciate and support the purpose and need of the project however, the Fuel Management Zones with the subsequent canopy removal would likely leave the project area in a more flammable condition. The proposed FMZ's: are not in line with PODs; with some running through active northern spotted owl (NSO) nest cores and; demand the need for continued maintenance beyond the ability or capacity of the agency. The intense amount of logging and ground based-disturbance proposed in Administratively Withdrawn Areas is also a concern and does not coincide with Forest direction.

FUELS MANAGEMENT ZONES MAY INCREASE FIRE BEHAVIOR

The >3,000 acres of ridgetop, roadside and property line FMZs, with a 600' maximum, are split between inner and outer halves. The EA states that areas that contain nesting and roosting habitat for threatened northern spotted owls (NSO) will retain at least 60% canopy (maintaining 150-180 ft² basal area) and 40% (110-160 ft² basal area) canopy within foraging habitat. The commercial logging prescription is variable density thinning with basal area (BA) targets. Prescriptions are further filtered by species composition, including, mixed conifer, mixed pine and mixed hardwood stands.

Within the Scoping proposal the first sentence when describing Treatment A. Ridgetop, Roadside and Property Line FMZ's says that these treatments were collaboratively developed in part with the Trinity County Collaborative. We respectfully note, that this is not entirely true, as the Collaborative has continuously sought and advocated for "shaded" fuel breaks, unlike what is proposed in much of the Hyampom project. The Collaborative White Paper is included with these comments for reference.

Maintaining forest canopy cover is crucial for reducing wildfire risk. A dense canopy acts as a natural firebreak by limiting the amount of sunlight reaching the forest floor, thereby reducing the drying of surface fuels such as dead vegetation and small trees. Shade helps to maintain higher moisture levels in the forest understory, making it less susceptible to ignition. Research indicates that large and severe fires in the west are associated with warm and dry conditions, which are expected to increase with climate change. Projections suggest that warmer and drier conditions will drive lower fuel moisture and longer fire seasons, likely increasing the frequency and extent of fires compared to the twentieth century.¹ Given this, maintaining a dense canopy is a vital component of effective forest management strategies aimed at protecting both human communities and forest ecosystems.

Recent peer-reviewed studies in the Pacific Northwest and Cascades have raised concerns about the effectiveness of logging and forest canopy removal in promoting wildfire resilience and reducing fuel loads in mixed-conifer forests. As well as the important role of canopy cover in moisture retention², wind reduction, and vegetation control.

A study published in *Forest Ecology and Management* examined the effects of logging and fire suppression on mixed-conifer forests in central Oregon. The researchers found that these practices have altered forest structure and composition, decreasing resilience to fire, drought, and insect infestations. The study suggests that such interventions may not effectively reduce fire severity and could potentially exacerbate ecological stressors.³

Research published in *Forest Ecology and Management* examined the influence of topography and fuels on fire refugia probability under varying fire weather in forests of the U.S. Pacific Northwest. The study found that mature mixed-conifer and ponderosa pine forests with greater small tree density tended to burn with lower severity. This suggests that maintaining a diverse forest structure, including some small trees, may enhance fire resilience more effectively than logging and canopy removal.⁴

Collectively, these studies indicate that logging and forest canopy removal may not be effective strategies for enhancing wildfire resilience in mixed-conifer forests in this region. Approaches that preserve forest structure will build resilience by preserving biodiversity, maintaining carbon storage and promoting ecological

⁴ "Fuel Reduction" Logging Increases Wildfire Intensity and Puts Communities at Greater Risk. John Muir Project, Scientific Study Compilation and Fact Sheet Sept. 2024. https://ecointegrityalliance.org/wp-content/uploads/2024/10/jmp-fact-sheet-thinning-and-fire-23sept24.pdf

¹ Halofsky, J.E., Peterson, D.L. & Harvey, B.J. Changing wildfire, changing forests: the effects of climate change on fire regimes and vegetation in the Pacific Northwest, USA. *fire ecol* **16**, 4 (2020). https://doi.org/10.1186/s42408-019-0062-8

² Heithecker, Troy. Microclimate Variation Associated with Dispersed-Retention Harvests in Western Washington: Master of Science thesis, 2005.

https://faculty.washington.edu/chalpern/Heithecker_Thesis_Final.pdf

³ Merschel, Andrew G., et al. "Mixed-Conifer Forests of Central Oregon: Effects of Logging and Fire Exclusion Vary with Environment." *Ecological Applications*, vol. 24, no. 7, 2014, pp. 1670–88. *JSTOR*, http://www.jstor.org/stable/24432264. Accessed 5 Feb. 2025.

processes that contribute to forest health. Please also see Page 4-6 of our November 2020, Scoping comments. The significance of canopy cover in regulating microclimates, controlling vegetation growth, and maintaining moisture levels in forested ecosystems cannot be overstated.

FUEL MODELING AND EFFECTIVENESS

While some studies support the use of fuel reduction treatments like thinning and prescribed burning to mitigate wildfire severity, they rely on burning and maintenance to carry effectiveness into the future. There is zero guarantee from the agency that burning and maintenance treatments will actually occur, yet the effects analysis in the Draft EA and fuels modeling relies entirely on it occurring.

The IFTDSS map produced in the Fuels Report uses stagnant extreme hot and dry conditions at 90% percentile. The two maps provided are single snapshots of one moment in time with little explanation of data, outputs or equations that were used. Since IFTDSS model makes it easy to compare different project alternatives, please run different models based on the reasonable alternatives provided in these comments, such as retaining at least 60% canopy throughout FMZ's.

The apparent limited temporal and stagnant scope of modeling in the Fuels Report and the Draft EA does not consider the effectiveness of treatments into the future nor the likelihood of the failure to implement burning and maintenance treatment. The EA fails to provide the "hard look" that NEPA requires and fails to consider a reasonable range of alternatives.

Studies have shown that there is a very low probability that project areas will encounter wildfire before fuels recover to hazardous conditions.⁵ Fuel-reduction treatments such as mechanical thinning can effectively reduce fire severity in the short term, but these treatments, by themselves, may not effectively mitigate longterm dynamics of fire behavior under severe weather conditions. The fires that thinning is designed to halt are wildfires that are driven by drought, high temperatures, low humidity and, most importantly, wind. Thinning—even when done properly—cannot halt extreme winds or embers, which blow through and over any amount of clearing.

ADMINISTRATIVLEY WITHDRAWN AREAS

We are greatly concerned with the amount of ground and soil disturbance, associated with logging, "temporary" roads, skid trails and landings as well as canopy loss and diminished visual quality, in semi-primitive non roaded management areas, particularly the unroaded FMZ ridge systems between Bennett

⁵ MM Boer, OF Price, RA Bradstock, Wildfires: Weigh policy effectiveness. *Science* **350**, 920 (2015). https://www.science.org/doi/10.1126/science.350.6263.920-a

Peak and Big and Big Slides Creek. The proposed FMZs in this area are not consistent with Forest direction and requirements. The map excerpts show the Administratively Withdrawn Area in pink, Pods in red with proposed ridgetop FMZs in aqua and the proposed action, respectively.



The Shasta-Trinity National Forest Land Resource Management Plan has a clear purpose for this area, "...this prescription is to provide for semi-primitive nonmotorized recreation opportunities in unroaded areas outside existing Wildernesses while maintaining predominantly **natural-appearing areas with only subtle modifications**. Special recreational and **visual values**, fisheries, and riparian resources are emphasized. Also emphasized in this prescription is retention of oldgrowth vegetation and **management of wildlife species requiring late seral stage conditions**."

Standards include; retaining late seral stage forest stands and; using this Prescription to help provide additional habitat and connecting corridors for fisher and marten and to provide additional habitat for goshawk. As proposed the unroaded ridgetop FMZs in Administratively Withdrawn Areas are not consistent with Forest Standards and are not strategically needed for fire suppression.

NSO

The continued focus only on nest cores and not the entire 1.5 miles home range or Activity Centers is perplexing. While the Draft EA does make some concessions for retaining at least 60% canopy in NSO nesting and roosting habitat and 40% in foraging, to retain habitat, the prescriptions in the Silvicultural Report could use clarification. On page 9, the prescriptions provide a 16" DBH limit in owl cores, which we fully support. However, further in the description, it supports the cutting of trees over 24" DBH. Please provide very clear prescriptions and marking guidelines in the Final EA and an updated silvicultural report.

Active Nest Cores



There are three *occupied* home ranges in the project area. While we support the treatment of plantations, we strongly urge project planners to forgo commercial logging in these unroaded Ridgetop FMZs. Occupied nest cores and home ranges should receive the highest priority for protection.

While Limited Operating Periods may limit disturbance in sensitive breeding and nesting times it does not entirely erase the harm from noise, smoke and habitat damage from commercial logging with subsequent "temporary" roads, landings and skid trails.

RIPARIAN RESERVES

It is unclear what exactly is proposed within the roughly 500 acres of Riparian Reserves (RRs) in FMZs. The Resource Protection Measures discuss Equipment Exclusion Zones as being only 25' for non-fish bearing and 50' for fish bearing creeks on page 46. Then on page 47 it says "no tree skidding is allowed in RRs". Then on page 48 only live trees under 14" would be cut in RR unless they are deemed a hazard tree. It discusses ground-based equipment working in RRs, and then work that would be done in "no treatment zones." The EA says no new landings would be constructed in RRs but then states that they would be if needed. The Agency seems to be all over the map when it comes to activities in RR's.

Further, Appendix D of the Fisheries Report has its own table and lists including, "Heavy equipment is allowed to operate in the EEZ portion of RRs only when the following conditions have been met: RRs on the uphill sides of roads, on slopes ≤35%, where they bisect the RRs (hydrologically disconnected) and where the RR extends beyond the crest of the slope." How many acres and where is this expected? Are RRs only located on Roadside FMZs, and not along property lines or ridgetops?

Riparian Reserves are extremely sensitive, especially to detrimental compaction from heavy equipment. The Aquatic Conservation Strategy (ACS) is clear that any action in the Reserves must be clearly needed. It is not clear that the project is clearly needed and the ACS Report consistently relies on resource protection measures to minimize impacts, yet negative impacts would occur in this already severely impaired watershed. Therefore, we urge planners to clarify the proposal and better to increase EEZ buffers to reflect ACS buffers as written.

CONCLUSION AND RECCOMENDATIONS

We ask the Shasta-Trinity National Forest to consider these reasonable recommendations as outlined above:

- Implement shaded fuelbreaks by increasing FMZ canopy to >60% (or at least 150 ft² BA).
- Greatly diminish or drop ridgetop FMZs in Administratively Withdrawn Areas, particularly the ridgetops between Bennett Peak and Big Slides Creek.
- Remove *ridgetop* FMZs in active NSO nest cores and home ranges.
- Expand EEZs in Riparian Reserves to reflect ACS buffers.
- Guarantee funding for underburning and long-term maintenance.

The Shasta-Trinity National Forest already has a heavy burden and backlog of thousands of acres of underburning and maintenance that has yet to be done. Please do not put the Hyampom community at further risk and prioritize the work where it is most needed. We ask project planners to incorporate shaded fuelbreaks along roads, property lines and only ridgelines outside of Administratively Withdrawn Areas, as well as plantation treatments. This would be more cost effective and better aligned with collaborative and community input. It would reduce the need for long-term maintenance and still meet the purpose and need of wildfire risk reduction. We appreciate your consideration and look forward to further collaboration to achieve the best possible outcome for both the environment and local communities.

Regards,

Kimberly Baker

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