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First name: Scott
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Comments: We appreciate the opportunity to provide scoping comments 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[rsquo]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 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 (collectively, [ldquo]rivers[rdquo]) 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 as well as rivers not yet fully evaluated for eligibility.

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Treatment Should Prioritize Essential Roads in High Severity Burn Areas

We agree with the project[rsquo]s objective to reduce public safety hazards along portions of roads and around facilities such as campgrounds, trailheads, developed recreation sites, administrative sites, and other built infrastructure.

We do not believe that there is a need to extend hazard tree treatment to low use spur roads, undeveloped areas, backcountry recreation sites, or anywhere along riverbanks or within Wild and Scenic River corridors. By including treatments in these areas, the Forest Service will unnecessarily create contention and controversy that may ultimately complicate or jeopardize

implementation of the more valuable parts of the proposed project.

Hazard tree treatment should be focused on roads that provide high value and use to the public and that are within high severity burn areas that experienced stand replacement fires. This includes roads that:

• receive moderate to high levels of use,

• provide ingress and egress to communities and their related infrastructure such as water systems and communications facilities,

• access private properties and permitted infrastructure and facilities,

• access developed and dispersed recreation sites or areas (including river access sites),

• are necessary for planned or ongoing Forest Service management activities, and

• that provide public safety value such as emergency egress routes or access to fire engine fill sites.

Trees That Are More Than One Tree Height Downhill of a Road Should Not Be Cut

Although trees uphill of a road may fall or slide slightly further than one tree height toward the road, trees downhill of a road cannot. Without exception, rivers are downhill of roads and, by not cutting further than one tree height below the road, the project may reduce its impacts on streams and rivers and their riparian corridors while still fully meeting its purpose to mitigate hazards posed by trees that can strike the road. The distance downhill from roads should be measured slope-wise, not level with the horizon (i.e., map view) since this is the ground distance that a falling tree can reach.

Areas of Different Burn Severity Class Have Different Conditions and Treatment Needs

California and its national forest lands have experienced a significant amount of high severity burn in the past three wildfire seasons. These areas have a high percentage of fire-killed and structurally damaged trees and consequently have a more critical need for treatment than do areas of low severity or moderate/mixed severity burn.

Fortunately, the prescription and marking needs for areas of stand-replacement fire are simpler than they are for areas of low or mixed severity fire. It is also less controversial to treat high severity burn areas than it is to treat other areas where healthy, fire-surviving trees are intermingled with killed or damaged trees.

There is likely much more work just within high severity burn areas than can reasonably be accomplished by this project, and the overwhelming focus of work should be directed to these areas. Low severity burn areas should be avoided altogether. Where roadside areas of mixed severity burn present public safety concerns, prescriptions should be developed that avoid cutting green trees and fire-surviving trees and that fell and leave only legitimate hazard trees while treating their residual fuels.

Typically, fires burn at lower intensity along rivers and in the bottoms of stream drainages than they burn at the mid and upper slopes. Consequently, river and streams are often in areas that remain unburned or that burned at low severity. By differentiating treatments according to burn severity and by focusing on treatment of high severity burn areas, the project can reduce its direct impacts to rivers. For areas along rivers that did burn at high severity, the project should avoid all cutting of trees that are more than one tree height from the road for which the hazard tree treatment is being provided. There is significant ecological and scenic value to retaining fire-killed and damaged trees along rivers and streams and their removal should be an action of last resort and done only for legitimate public safety needs for a prioritized roadway.

Coarse Woody Debris Should Be Retained But Hazard Trees Should Not Be Felled Into Rivers

The ecological value of coarse woody debris is well-known, and fire is one of the primary processes that creates CWD in forest ecosystems. All large-diameter (>36[rdquo]) hazard trees that are cut should be limbed and left on the landscape to benefit natural fire-recovery processes.

Residual fuels from limbs should be piled and burned, where appropriate, or chipped to reduce future fire intensity and flame length.

Fire also serves as a primary process that results in the recruitment of large woody debris to streams and rivers. This is essential for aquatic ecosystem function and should be allowed to occur naturally in the post-fire environment. Hazard trees should not be felled into rivers where they are likely to pose substantial hazards to river users. The Forest Service should place informational signage at informal and formal river accesses along rivers that have been affected by high intensity wildfire, alerting river users to the fact that there may be new and increased amounts of wood in the river.

The Proposed Action Will Affect Numerous Wild and Scenic Rivers

The proposed action has the potential to significantly impact rivers and streams that are federally designated as Wild and Scenic or that have been formally determined by the Forest Service to be eligible for inclusion in the National Wild and Scenic Rivers System. Project impacts are also likely within designated and interim Wild and Scenic corridors associated with each river segment.

For designated rivers, the Forest Service has a legislated mandate to [ldquo]protect and enhance[rdquo] the rivers[rsquo] values that caused them to be designated, with a primary focus on [ldquo]esthetic, scenic, historic, archeologic, and scientific features.[rdquo]1

For eligible rivers, Forest Service must provide for the protection of free-flowing condition and water quality, maintenance of the rivers[rsquo] classification (degree of development and scenic quality), and protection of the outstandingly remarkable values that have been identified and, to the extent practicable, enhance these values.

Although the Forest Service has not provided geospatial data for the proposed action and, consequently, we have been unable to definitively identify all designated and eligible Wild and Scenic rivers that may be affected via GIS analysis, it is discernable from the Forest Service project maps that every one of the nine national forests in the project area has both designated

and eligible rivers. With the possible exception of the Sierra National Forest, all forests have

1 See Section 10 of the Wild and Scenic Rivers Act, Public Law 90[ndash]542 (October 2, 1968).

designated or eligible rivers in close proximity to roads and trails proposed for hazard tree management. This is particularly true for the Klamath, Six Rivers, and Shasta-Trinity national forests.

The proposed action will affect aesthetic and scenic values along hundreds of miles of designated and eligible Wild and Scenic rivers on national forest land. However, the proposed action makes no mention of these rivers nor does it contain any project design features aimed at minimizing or eliminating impacts to river scenery. The proposed action needs further refinement to meet the Forest Service[rsquo]s obligation to protect the scenic value of all designated and eligible rivers.

Similarly, the proposed action is likely to impact water quality on these rivers. Skyline yarding should be utilized wherever possible to reduce soil impacts and erosion, especially near streams and rivers where slopes tend to be steep and little filtration occurs as rainwater runs off.

Beyond designated and eligible Wild and Scenic rivers, the proposed action is also likely to adversely affect rivers that are not designated or that have not yet been evaluated for Wild and Scenic eligibility. This may potentially affect future eligibility determinations. This is a particularly timely issue as Region 5 has already begun its forest plan revision process and will be continuing soon with more plan revisions, the process by which eligibility is evaluated. Extra consideration and analysis should be given to potentially eligible rivers and streams within the project area and mitigations should be used to prevent project-related degradation of scenery and other river values.

The Forest Service Should Make Project Geospatial Data Available

Given the vast geographic scope of this project, it is difficult to provide a detailed assessment

and comments without the ability to use computer-based mapping tools such as GIS analysis. The Forest Service should provide geospatial data for its proposed projects from the scoping stages forward on its project websites, without the need for a Freedom of Information Act request. Doing so will promote public engagement and assist the Forest Service with receiving detailed and substantive comments that can help improve agency projects. The Forest Service has not yet made this project[rsquo]s geospatial data available, and this has prevented us from being able to fully assess the project as it relates to rivers and in context with our own geospatial data

about whitewater river resources. We look forward to the Forest Service providing this project[rsquo]s data as soon as possible and no later than the release of the draft Environmental Analyses.