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Title:

Comments: Please accept the attached PDF as my submitted comments for the 2021 Wildfire Roadside Danger Tree Mitigation Project (#62951).

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

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.

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.