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Comments: The Bear Country project represents a unique opportunity to actively manage a portion of the Forest that has not experienced any large-scale wildfires in recent history. The project area is essentially an island in the middle of several recent fire footprints, including the 2013 Salmon Complex, 2014 Whites Fire, 2017 Wallow Fire, 2020 Red Salmon Fire, 2021 River Complex, and several large fires from 2006, 2008, and earlier, that overlap with many of those mentioned above. The likelihood of proactively treating this area before it is affected by a large wildfire seems to diminish with every below-average winter that we experience. In 2021, the fire in Graham Gulch had the potential to burn a large portion of the project area had it not been contained during extended attack. The project area's remote location, steep terrain, and adverse access for fire suppression crews, as well as general factors including cumulative drought stress on vegetation, the effects of climate change, and the developing trend of annual record-breaking ERC's, all point to the critical need to implement the proposed action to reduce fire risk to communities, firefighters, and wildlife habitat, and increase the likelihood of success for fire management, before another such ignition escapes suppression actions. This letter serves to provide my full support for the treatments proposed in the Bear Country project.

In order to fully meet the intent of the proposed action of this project and effectively reduce risk, the entire scope of treatments must be implemented. This means implementing not just the hand and mechanical treatments, but also the proposed prescribed fire treatments on 9,253 acres of the project area. For example, while mastication may reduce fire effects such as rate of spread, fire intensity, and flame lengths in the pine plantations on the south aspects of the project area, research indicates that such treatments may not actually reduce residual tree mortality following wildfire and goes on to recommend prescribed understory/broadcast burns to improve resilience of such stands to wildfire (Knapp, 2011). Other studies indicate that fire effects can be increased in the short-term (1-3 years) by mechanical thinning alone when not followed by prescribed fire, and that when mechanical thinning does provide the intended benefits of fire-risk reduction, those benefits tend to decrease with shrub and tree regeneration. These benefits can be significantly extended with follow-up prescribed fire treatments (Johnston, 2021). It is encouraging to see proposed treatments in this project area that recognize the need for follow-up prescribed fire treatments, including the plantation units on the south aspect near Forks of Salmon, as well as the units at the headwaters of Indian and Negro creeks.

The third component of the Purpose and Need of the project allows for the construction of strategic fuel breaks that will tie into the Eddy LSR project, and thus facilitate the completion of over 5,000 acres of landscape scale prescribed fire in the Shadow Creek watershed. These complementary control lines, in conjunction with contingency control lines installed in the area during the 2021 River Complex, will increase the chances of success for the implementation of an important prescribed fire project in the Salmon River watershed.

Like the Shadow Creek burn unit of the Eddy LSR project, the North Fork/Smith Ridge compartment burn unit of the Bear Country project largely consists of initial-entry prescribed fire treatments. There is a sentiment among some that initial-entry prescribed fire treatments are not possible, or not prudent, or are too risky to implement. To these arguments I would like to offer three responses. The first is that landscape-scale prescribed fire (including prescribed natural fire, also known as managed wildfire) treatments are the only way that historical fire regimes can ever be returned to. Small-scale treatments around communities, ingress/egress routes, and other values-at-risk are very important, and should be prioritized and supported, but will not on their own affect enough area to have an impact on landscape scale forest resiliency. Second, we should encourage everyone to compare the effects of prescribed fire treatments not to the pre-fire landscape in which they occur, but to the likely outcome of an uncontrolled wildfire in the same area. A staggering portion of the Klamath National Forest has experienced large-scale uncontrolled wildfire in the last decade, and to expect that these proposed initial-entry areas would not be subject to the effects of fire burning under 90th percentile weather conditions or greater would be much more of a risk than treating them with prescribed fire during a more desirable time. As an example, the Shadow Creek watershed was one Management Action Point away from being fired off in August during the River Complex and would have very likely experienced far more undesirable effects than a planned ignition in

November. Third, there are examples of initial-entry treatments that have been very successful, including the Patterson Mountain project on the Kings River Ranger District of the Sierra NF. Projects like this offer encouragement, learning experiences, and expand social and political acceptance of prescribed fire on large scales.

Last year, the US Forest Service Pacific Southwest Region and the State of California co-signed the Agreement for Shared Stewardship of California's Forest and Rangelands - an MOU that commits the Region to scaling up to treating 500,000 acres per year by 2025. Among possible treatments, the agreement specifically calls for the expansion of prescribed fire, calling it "key to effective stewardship at scale."

Fortunately, there is growing support in our local communities for prescribed fire treatments, both on NFS lands and private lands. Programs and organizations such as local Fire Safe Councils, Prescribed Burn Associations, the Prescribed Fire Training Exchange (TREX), the Western Klamath Restoration Partnership, and more, have been working to increase awareness of the benefits of prescribed fire and to help our communities be ready and able to live with fire - both prescribed and unplanned ignitions. These and other organizations are also working to build capacity to plan and implement prescribed burns on private, public, and cross-boundary lands. We all share the responsibility to do what we can to restore our landscapes and make them more resilient to fire, drought, and disturbance. Implementing projects such as this one, including the prescribed fire component, is an important part of meeting that responsibility.

I look forward to the implementation of this project and I encourage the Klamath to be bold and lead the Region in the implementation of these large-scale prescribed burns that will benefit the forest, the watersheds, the fish and wildlife, the communities, and the people who call this place home.