

August 15, 2022

Wild Rivers Ranger District
26568 Redwood Highway
Cave Junction, OR 97523

RE: Slater Fire Reopen Project #62020 Scoping Comment

**Slater Fire Reopen Project Public Comment
Supplemental comments from Klamath Forest Alliance**

The following comments are supplemental, additional and complementary to our previously submitted public scoping comments. Please consider these issues in any NEPA process going forward. These constitute relevant issues that must be addressed through meaningful alterations to the currently proposed scoping project.

The proposed 200' cut strip is arbitrary and capricious

As mentioned in our previous comments past fire areas have had smaller roadside hazard treatment areas including post-fire hazard abatement on the nearby Biscuit Fire. Additionally, areas like the 2017 Abney Fire area have received no roadside hazard treatment and have been both safely used by the public and efficiently managed by the Forest Service to provide safe, effective public access.

The 200' cut strip proposed along existing roads is not based on science or any establish protocol. It also fails to consider the various land use allocations throughout the planning area and does not consider those areas less than 200' where due to terrain and its influence on striking distance actual public safety hazards do not exist and do not actually contain true hazard trees. In many cases these areas contain snags and trees that are not hazardous and should not be targeted for hazard tree felling.

At the very least, the 200' cut strip or treatment proposed in the scoping notice is arbitrary and capricious. The agency must justify the size of proposed treatment areas from a public safety standpoint. It must also consider the size of the necessary treatment area on a site specific basis. The current proposal to treat all roads and all circumstances with an arbitrary 200' treatment area is not reflective of the purpose and need and is so unnecessarily broad that project impacts are difficult to analyze with any meaningful specificity. This specificity is required under NEPA and the use of an overly broad 200' treatment area is arbitrary and capricious.

Treatment in Fuel Management Zones (FMZs) outside the fire footprint is not sufficiently defined

Treatments in Fuel Management Zones are ill defined throughout the planning area. Will these treatments be non-commercial or commercial, will they include mechanical or mechanized

thinning? What are the parameters for treatment? Little meaningful information is offered in the Scoping Notice. Additionally, the scoping notice fails to define project treatments in areas outside the fire area such as road 4803 extending up to Sanger Peak. This area is outside the fire area, will not be treated for hazard trees and its treatment remains entirely undefined in the scoping notice.

FMZ proposed to Sanger Peak and up the 4803 road outside the Slater Fire Perimeter contains unique, unusual and important plant communities.

The FMZ proposed along road 4803 to Sanger Peak contains unique, unusual and important plant communities including large stands of Brewer's spruce. The treatments proposed in this area have not been adequately defined along 4803 or in any area outside the planning area. In fact, as mentioned above treatment protocol in areas outside the fire area and not described or disclosed in the scoping documents. We are concerned by "treatment" in these areas as the forest service has little to no information regarding the efficacy or need for thinning in Brewer's spruce stands.

Brewer's spruce is an endemic conifer to the Klamath-Siskiyou Mountains with a narrow habitat niche including rocky, cold habitats, usually found in, but not limited to high country habitats and fire refugia. It grows in areas of fire refugia, where fire rarely burns and never supports significant fire resistance. It is also growing back abundantly in the recent Abney Fire footprint within previously occupied habitats that burned at high severity, demonstrating resilience to high severity fire and a significant natural regenerative response in the years following a fire event.

There is no evidence to suggest that Brewer's spruce evolved natural resistance strategies to fire except as a fire avoider. Fire proofing efforts and fuel reduction may be inappropriate, and commercial logging is certainly not beneficial to these sensitive trees that are easily damaged through mechanical impacts and are easily impacted by subtle changes in microclimate conditions.

The upper portions of road 4803 extend into the Chicago Backcountry Area and the backcountry values should be protected by applying the Standards and Guidelines in the LRMP and by eliminating commercial tree removal in this area. Additional areas along road 4803 also contain high conservation values and unusually intact native plant communities. It also includes populations of rare and sensitive plant species including *Illicium latibracteata*, *Solanum parishii*, *Monardella purpurea*, and *Cypripedium fasciculatum*. These species should not be disturbed and will not benefit from thinning treatments or yarding activities. Except for *Cypripedium fasciculatum* these species would benefit from wildfire, including high severity fire and therefore, are not in need of restoration thinning. They are in need of fire of any severity to rejuvenate and expand populations.

Additionally, the area is often very rocky, creating natural breaks in fuel continuity, natural barriers to fire spread, and areas of low fuel loading. These areas are also not in need of

treatment and the thinning operations proposed will provide no real fuel reduction benefit as fuel conditions are naturally moderated by the rocky ground and low vegetative cover. Treatments in the upper portions of road 4803 and outside the Slater Fire area would not benefit the areas biological values, significantly reduce fire risk, or meaningfully benefit future fire containment. All road segments outside the Slater Fire area should be canceled to protect sensitive land use allocations, rare and sensitive plant populations, and natural habitat values.

Proposed fell and leave treatments could include manual fuel reduction or slash removal of small diameter branches if inappropriate fuel loading from felled trees is a concern.

We believe an alternative should be developed that includes fell and leave prescriptions accompanied by slash removal and pile burning of small diameter branches if inappropriate fuel loading from felled trees is a concern. This would address fuel and fire risks wherever they develop due to project activities and a heavy flush of downed material. Meeting the Purpose and Need many require some additional fuel reduction or slash removal by cutting and piling small diameter limbs and tops. Larger diameter coarse wood is a benefit to fire scorched soils, riparian areas, unstable soils, wildlife, water retention capacity, soil development, habitat complexity and natural vegetative recovery. These larger diameter downed trees do not contribute to fire severity or meaningfully contribute to the rate of fire spread in future wildland fires. Consider identifying a threshold for fuel density following tree felling operations and requiring pile burning operations to reduce fuel loading to acceptable levels. Additionally, all impacts to native plant regeneration from pile burning and slash removal should be analyzed as part of the cumulative impact and for its impact on vegetative recovery in the project area.

Thank you for considering our supplemental comments to the Slater Fire Reopen Project.

Sincerely



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