

Lassen Forest Preservation Group

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a committee of the Yahi Group, Sierra Club  
affiliated with the Sierra Nevada Forest Protection Campaign

6-28-98  
Lester Snow, Executive Director  
CalFed Bay/Delta Program  
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Suite 1155  
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Dear Mr. Snow,

Thank you for the opportunity to comment on the CalFed Ecosystem Restoration Program Plan. We think that some parts of this plan will really help with ecosystem restoration, but that other parts may have the opposite effect.

Protect the Upper Watershed

We find some serious flaws with the Vision for Upper Watershed Processes. As worded, it may result in the opposite effect than intended. We don't believe that increased logging would increase water yield by reducing transpiration, nor that it would ensure any reduction in catastrophic fire risk.

It may be incorrect to assume that most of the forest is denser or that stand-threatening fires now occur more frequently than in presettlement times. J. Goldsborough Bruff, a forty-niner who traveled the western slopes of the Feather River drainage between 1849 and 1851, kept a detailed diary in which he recorded dense forest conditions six times more often than open. Many other accounts of early explorers identify dark or impenetrable forest. "The presettlement forest was far from a continuum of open, parklike stands" (SNEP Vol.1 p.63).

No doubt historic harvests of fire-resistant species and large trees combined with fire suppression have resulted in the development of dense, fuel laden, young forest in many areas; but that should not justify the greatly increased logging that would occur if the Quincy Library Group plan were adopted as a Sierra-wide fire risk reduction strategy. That would ignore the Sierra Nevada Ecosystem Project report's major finding that, "Timber harvest, through its effects on forest structure, local microclimate, and fuel accumulation, has increased fire severity more than any other factor" (SNEP Summary, p. 4).

Far from representing "the most highly developed example of local consensus building", opposition to the QLG bill now pending in the Senate is widespread and includes the Tahoe Forest Issues Group, Plumas Forest Project, Lassen Forest Preservation Group and 137 other regional, statewide, and national environmental groups. The QLG plan is primarily an economic strategy to provide sawtimber for Sierra Pacific and Collins Pine and provide a reliable source of fuel for the biomass plant in Westwood.

In my opinion, the QLG plan's most major flaw is that it has no provision for prescribed burning and thus ignores the SNEP finding that all mechanical treatments will fail to reduce fire line intensity and rate of spread unless surface fuels are also treated. SNEP found that "Prescribed burning appears to be the most effective treatment for reducing a fire's rate of spread, fireline intensity, flame length, and heat per unit area" (Vol. II, p.1113). The programmatic actions you've identified include installing a system of fuel profile zones (as in the QLG plan) but fail to mention the need for increased prescribed burning.

Though one of the fire management strategies discussed in SNEP is the defensible fuel profile zones (DFPZ) concept, SNEP goes on to recommend, "DFPZs will serve as areas of entry into larger landscapes to facilitate more widespread fuel treatments, such as prescribed fire..." (Vol. I, p.69).

The DFPZ strategy, by itself, has major flaws that could actually increase catastrophic fire risk. It calls for reducing the forest canopy to no more than 40 percent cover over a strip up to a quarter-mile wide. This would let more sunlight in, causing drier conditions on the forest floor within that strip, and causing the rapid growth of typically highly flammable brushy plant species.

Also, on the forests where it is now proposed, the QLG plan would require this radical thinning on 67,600 acres of Late Successional Old Growth (LSOG) identified in SNEP as deserving preservation. Forty percent canopy cover is low habitat capability for species dependent on old growth. Not only would the establishment of DFPZs require new roads and further fragment these rare LSOG ecosystems, but that fragmentation would most likely increase dramatically because of windthrow at the abrupt edge between late and early seral conditions. The Forest Service estimates the "break could widen by 200-300 feet over the next 10-20 years" ... and "would split existing habitat for species such as spotted owls, northern goshawks, and marten that prefer interior forest conditions" (D. Romberger '98, Legume FRZ EA, HCRD. LNF). Increased windthrow would also further increase the highly flammable brushy zone and require increasing expenditures to maintain those DFPZs.

SNEP recommends, "Treatment of identified high-quality LSOG acres should emphasize prescribed fire and minimize mechanical disturbances. Intensive management activities such as creation of shaded fuel breaks, removal of small to moderate sized trees, and other fuel reduction activities should be located in areas adjacent to the high-quality late-successional forest rather than within them" (Vol. II, p.653).

In discussing the DFPZ strategy, SNEP recommends they be located "where possible along existing roads" and "with respect to the urban-wildland intermix and other high-value areas (such as old-growth or wildlife habitat areas), areas of high historical fire occurrence, and/or areas of heavy fuel concentration" (Vol. I, p. 69).

We concur that if you decide to greatly increase fuel management through mechanical means you should concentrate such efforts where it is most needed, such as in the urban-wildland intermix, and in areas verified to have heavy fuel concentrations. If such fuel concentrations occur next to other high-value areas, then fuel treatments should be done only outside those areas, in stands already previously logged, preferably next to west and south facing slopes where, due to drier conditions and prevailing winds, fire is most likely to spread.

You should not so eagerly endorse the QLG's DFPZ concept, though, since it is not a proven strategy. It is not even mentioned in most National Forest Land Management Plans. SNEP also discussed other fuel management strategies, such as patch thinning of high fuel load areas as modeled with FARSITE (SNEP Vol. III, Ch. 19), which, because of its flexibility, appears to be more successful and less environmentally damaging than shaded linear fuel breaks.

In some cases the fuel loading may be so high that prescribed burning is not feasible without some mechanical treatments first; but before any sawtimber removal, the biomass should be thinned first. Too often the Forest Service allows the commercial aspect of its "forest health" projects to proceed without assurance that there will be money to pay for the more crucial biomass treatments. Instead of sacrificing the sawtimber to pay for the beneficial parts of a project, more service contracts should be awarded to do biomass thinning, preferably by employment of local hand crews.

Before any thinning, though, we recommend that, whenever feasible, priority be given to prescribed burning as the primary fuel management strategy used to reduce the risk of catastrophic wildfire and thus help increase the reliability of high quality water flows from the upper watershed. Returning a natural fire regime to the middle-elevation Sierran forests would be good for its ecology.

#### Don't Build New Dams and Canals

We think that the 23 new or enlarged dams, diversions, and canals proposed could push the Central Valley's endangered salmon runs over the brink to extinction and would wipe out habitat for many Federally protected or sensitive wildlife species. This is especially ironic in that CalFed was prompted mainly by the decline of fish and wildlife species in the Delta and its tributaries caused by the massive system of dams that have harnessed the Central Valley's waterways. You cannot resolve the delta's flow problems by building more dams and diversions.

We think the worst of those proposals is the enlargement of Shasta Dam. The resulting inundation of the upper Sacramento, McCloud, and Pit Rivers would be an ecological and economic disaster. It would drown the unique rare plant habitat found on the geologic island within the vicinity of the confluence of those rivers. It would destroy too much other wildlife habitat, too, both upstream and downstream.

We would lose segments of river found eligible for inclusion in the National Wild & Scenic Rivers System because of their outstanding fishery, scenic, geologic, and historical/ cultural values.

Instead of pouring more concrete, we urge you to consider and endorse an alternative based on conservation and restoration. You should ensure strong conservation programs and economic incentives to use our water more efficiently, and restore and protect our watersheds and groundwater basins.

Keep the Sacramento River Meanderbelt

We support your proposed restoration objectives for Central Valley stream flows, water temperature, stream meander, flood plain management, and riparian/ riverine habitat, as well as all endangered, threatened, and sensitive species. These restoration objectives are needed to mitigate the impacts of current water facilities.

We especially praise your recognition of the need for and inevitability of a Sacramento River meanderbelt. Apart from bridges and other public works usually located on naturally stable stretches, the river's essential ecological process of erosion, deposition, and natural vegetative succession would be encouraged by setting levees back from the riverbank and cutting off taxpayer financing of riprap projects which are of short-term utility anyway. It's high time we recognized the folly of allowing buildings or perennial crops such as orchards in floodplains.

Please enter these comments into the formal record for your Draft Programmatic Environmental Impact Report and Statement and keep me informed as to your resolution of the issues and alternatives presented. I wish to incorporate by reference the comments of Vivian Parker.

Sincerely,



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