

BOARD OF SUPERVISORS

January 27, 2015

Eldorado National Forest
ATTN: King Fire Restoration Project
100 Forni Road, Placerville, CA 95667
Comments-pacificsouthwest-eldorado@fs.fed.us

The Amador County Board of Supervisors is pleased to support the rapid consideration of restoring the King Fire area. We support the purpose and need of the proposed action as outlined in the project description. We support the focus on high severity areas and areas unlikely to regenerate naturally. We support the removal of dead trees that without removal create a dangerous future fire condition. We are disappointed that less than 25% of the area will be treated when 50% of the fire area burned severely. Moreover, we are disappointed that an estimated 1 Billion Board Feet of timber was killed in the fire but less than 1/5 is proposed for removal. As you develop more completely the Proposed Action, we ask that you consider the following.

Greater Than 35% slopes: The focus on slopes less than 35% may be too limiting to accomplish Purpose and Need numbers 1, 2, 3, and 4. If done earlier enough, there should be sufficient value to cover the cost of skyline or helicopter salvage. Beyond the disadvantage of costs, skyline and helicopter salvage operations will likely provide less erosion and sedimentation than traditional tractor logging. More importantly, it will provide more of a landscape approach to restoration and provide hope of future fire control than a focus on slopes less than 35%.

Recreational Uses: The Proposed Action identifies a number of factors considered in identifying areas to be restored; one of which is safety. In the description, safety appears limited to roads and infrastructure within and adjacent to National Forest System lands. This limitation often results in land closures to forest visitors. In the short-term, burned areas provide recreational opportunities such as mushroom gathering that should be considered just as you consider habitat for the black-backed woodpecker. Beyond the short-term, the Purpose and Need should include restoration of all forest uses, including recreational uses. A good place to begin is to identify forest roads, trails, campgrounds, areas used for hunting, fishing and mushroom gathering, and the safety considerations needed to resume such recreational uses. Forest closure is not acceptable where treatments could be completed and still meet other forest objectives.

Brush Control: The Proposed Action acknowledges that the King Fire is not an ordinary fire in the sense that it would not have occurred under historic conditions. "Natural" conditions therefore will not be restored using ordinary methods; ordinary methods being the treatment of some areas and setting aside other areas. As we have learned in the Power Fire, all of the fire area will grow brush very quickly that will define the forest condition for the coming century. The control of grass and brush will be a major factor in restoring forest conditions and future catastrophic fire prevention. Yet if acted

upon quickly, the large fire landscape provides an opportunity for the utilization of brush control methods not available in many present day forests, and like timber harvest, will be limited in just a few short years. Therefore, while these future actions are not connected to the proposed action, evaluating areas for future brush control is an important consideration in determining what areas to restore and not restore under the proposed action. These methods include:

- Prescribed fire – The native forest grew under a frequent fire regime. Today, there is a lot of support for restoring fire to the landscape but current forests are not in a condition to accept frequent fires. As vegetation returns in this landscape, there is an opportunity to accompany that growth with fire. To do so, will require removal of many of the dead trees that otherwise will fall and create a future condition that is too hazardous to introduce fire. Areas that might be considered for future fire should be considered for tree removal in this proposal.
- Grazing – After most wildfires, grazing is withdrawn or reduced for many years. This is also a period of rapid vegetation growth. When grazing is again permitted, it is often after the vegetation has grown beyond the grazing ability of the cattle. Early and increased grazing could help many areas control brush until restoration of tree species is successful. Parts of the King Fire were under active grazing lease and since grazing will require the removal of many of the dead trees, the preservation of the option should be included in this proposal.

Tree Planting: Based on the Power Fire, areas that are planted early have a much greater survival rate and reduced need for successive brush treatments. Trees planted several years after a fire require more intense brush treatments. Therefore, the timing of the tree planting is an important consideration in forest restoration. Even in areas likely to receive some natural regeneration, it might be wise to consider light tree planting early, in appropriate patterns that consider the likely supplemental planting by natural regeneration.

Riparian Forest Regeneration: Many scientists believe riparian zones are the most altered of all forest ecosystems. Again, the King Fire has created an environment where restoration of riparian zones is necessary. We recommend a research project that examines methods to restore riparian habitat to desired conditions.

We appreciate the opportunity to comment on the proposed action and look forward to working with the Forest Service to restore the King Fire area.

Sincerely,

Amador County Board of Supervisors
Brian Oneto, Chairman

Cc: Senator Tom McClintock
Assembly Member Frank Bigelow
Assembly Member Tom Berryhill
Rural County Representatives of California
California State Association of Counties
National Association of Counties