



COUNTY OF SISKIYOU

Board of Supervisors

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June 18, 2024

ATTN: CSNM RMP Project Manager
BLM Medford District
3040 Biddle Road
Medford, OR 97504

Subject: Cascade-Siskiyou National Monument Draft Resource Management Plan and Environmental Impact Statement

To Whom it May Concern:

The Siskiyou County Board of Supervisors is writing this letter to provide comments on the Cascade-Siskiyou National Monument Resource Management Plan (RMP) and Environmental Impact Statement (EIS). Siskiyou County has previously provided comments during the development of the Cascade-Siskiyou National Monument.

On June 14, 2023, the Siskiyou County Agricultural Commissioner, James Smith, sent a notice to the Bureau of Land Management Project Manager accepting the invitation to participate in this effort as a Cooperating Agency, however, Mr. Smith never received a response to the notice. Therefore, through this letter, we are re-requesting that Siskiyou County be considered a Cooperating Agency and allowed to coordinate with the BLM in accordance with 40 CFR 1508.5. Please respond to this request no later than July 12th, at the contacts below.

Approximately 62% of Siskiyou County lands are under federal ownership and are managed as forested lands by the United States Forest Service, which makes the topics of forest health, catastrophic wildfire and timber harvesting a top priority for the County. The County, along with much of the West, faces increasing, and larger scale, catastrophic wildfire which has severely impacted Northern California on an almost yearly basis. We are requiring that the BLM implement activities within the Monument boundary that fully protect communities vulnerable to Wildfire while promoting forest health and catastrophic wildfire resiliency, forest thinning, fuels density management, and livestock grazing. As we communicated in years past during the proposed expansion of the Monument, management activities must be taken with full consideration of creating a healthy landscape that is resistant to catastrophic wildfire. Below are Siskiyou County's comments on the Draft RMP and EIS.

Livestock Grazing:

In 2015, the Board of Supervisors adopted a Grazing Policy, which is included as Attachment 1 to this letter. The Policy aims to detail the County's priorities regarding federal grazing lands and provide scientific and economic information to enable federal and state agencies in their grazing decisions. Any

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decisions by state and federal agencies concerning grazing in Siskiyou County shall be consistent with the attached policy, and specifically, grazing activities shall not be reduced or eliminated on public lands.

Targeted livestock grazing is very effective in reducing fuel loads, especially within the Wildland Urban Interface (WUI) where homeowners are particularly concerned about fire risk. Researchers have found that one of the most effective ways to address fire fuel problems is to integrate livestock grazing with other vegetation management activities, including prescribed fire and chemical or mechanical treatments. Consequently, removing livestock from upland landscapes increases the risk that grasses and finer fuels will accumulate, meaning that the chances of devastating, landscape-altering fires are far greater.¹ According to the USDA, the spread of invasive grasses is one of the main contributors to increased fire size and frequency on certain rangeland landscapes, and areas with invasive grasses burn 2-4 times more frequently than areas dominated by annual grasses. Using livestock grazing to create fire breaks in swaths of invasive grasses, rangeland managers can help prevent wildfires from turning into catastrophic ones.²

Wildland Urban Interface Protection:

The original Healthy Forests Restoration Act (HFRA) legislation is cited as requiring suppression within one-quarter of a mile of a community at risk. Several western Fire Safe Councils have expanded this boundary to the nearest ridge or formidable natural barrier above a Community at Risk. Adequate defensive lines are critical during firefighting activities to protect communities and must be implemented as part of the WUI portion of the management plan.

As stated in the Draft EIS “WUI treatments under Alternative B would occur on more acreage and in more lands with wilderness characteristics units than in Alternatives B and C. WUI treatments have short-term negative impacts on apparent naturalness and solitude and primitive and unconfined recreation; over time they would enhance naturalness by creating forest stands that more closely mimic the appearance and function of forests in which natural fire has not been suppressed.”³

Alternative B is not the Preferred Alternative. By implementing the Preferred Alternative there would be a reduction in effective WUI protection by not allowing the current acreage to be treated. The Preferred Alternative also decreases the acres allowed for manipulation within the WUI below the No Action Alternative, which in turn increases threats to public safety directly impacting communities at risk. The Preferred Alternative shall include the same treated acreage and WUI protection described under Alternative B.

Socioeconomics:

In the Draft EIS, where Socioeconomics is discussed, it states “... Alternative C could pose an increased risk of wildfire to private property and communities, which could be viewed as having a negative, potentially disproportionate impact on low-income populations depending on where the risk of wildfire would increase.”⁴ This anticipated impact violates the intent of the HFRA federal responsibility to protect communities at risk and the impact must be elevated to a public safety threat.

¹ Charles A. Taylor, P. a. (2006). *Targeted Grazing to Manage Fire Risk*. Centennial: American Sheep Industry Association.

² USDA. (2022). *Targeted Grazing for Wildlife Fuel Breaks*. Retrieved from Climate Hubs U.S. Department of Agriculture

³ EIS at page 112.

⁴ EIS at page xxi

Wildland Fire Management:

The Draft EIS states that “Alternatives A and B would contribute the most toward wildfire risk reduction to the WUI and CSNM objectives and values, followed by Alternative C and Alternative D”. “Alternatives A and B would achieve 20 percent wildfire risk reduction thresholds. Alternative C would achieve greater than 10 percent but less than 20 percent wildfire risk reduction”. “All alternatives create landscape heterogeneity, with Alternative B creating the most over a wider area and Alternative D the least. Restoration of Fire Regimes I and III within the EMA is likely under Alternatives A, B, and C, but with a lower probability under Alternative C”.⁵ “Alternative B is most likely to restore historical fire regimes and Alternative D is least likely.”⁶

These statements appear to contradict or diminish the overall RMP purpose of restoring fire regimes and native plant restoration. All alternatives aim to meet the goals of restoring fire regimes and native plant restoration except for Alternative C, which is less effective than the No Action Alternative. We believe the preferred alternative does not meet the “Purpose and Need” stated goals for Wildland Fire Management.

Terrestrial Wildlife:

The EIS states that “Common across all action alternatives is preservation of closed old refugia (COR) forests by excluding vegetation treatments, which would contribute to the persistence of older, structurally complex stands that occur on cooler, moister sites”.⁷ This statement precludes WUI treatments allowed under current Northern Spotted Owl ESA regulation when treatments do not alter ecological function (i.e. changing nesting/roosting to foraging or foraging to non-habitat classifications where public safety is jeopardized by hazardous fuels buildups). These treatments should not be excluded from the management plan.

Impacts not Addressed in the EIS:

The following potential impacts must be analyzed as part of the EIS.

Noxious weeds have not been analyzed nor is there a plan being developed to prevent or abate the spread of noxious weeds to private lands. Noxious weeds must be analyzed as part of the EIS, and a plan developed to protect private property from the spread of noxious weeds that result from the BLM’s management practices. Noxious weed spread by water borne seeds is well documented along the Klamath River and a persistent issue well outside the immediate project being analyzed. Now that the Klamath Dams have been removed, the free-flowing waters from the Monument area pose a new noxious weed vector that is not addressed in the EIS.

There is no analysis of wildfire smoke impacts to the public regarding long term (4–6-month incident duration) exposure to smoke that may result from the management practices proposed in the EIS. Significant populations of Siskiyou County and the Medford area of the Rogue River Basin have been significantly affected in recent years due to public land modified suppression actions and policies.

There is no analysis of implementing the modified suppression policies regarding the potential costs imposed on local fire jurisdictions and local governments who must respond to long-term fire events occurring within the Monument and under the proposed management plan. In recent years Siskiyou County has documented tens of millions of unreimbursed dollars spent protecting the public. In addition,

⁵ EIS at page xxii

⁶ EIS at page xxiii

⁷ EIS at page xxiii

increased road maintenance activities and disruption to commerce are a result of long-duration firefighting strategies not being analyzed in the EIS.

Relying on modified suppression actions to restore a natural fire regime is highly speculative and not well researched. Considerations must be made for adequate firefighting resources should the fire escape its natural barriers. The EIS does not analyze this firefighting resource availability, nor does it key these decisions to fire planning levels prior to immediate suppression. Using modified suppression as a management tool in this EIS indicates documents that this is an agency discretionary decision. As such, it must be funded and thoroughly analyzed for impacts to both the environment and public safety either from direct fire loss on private property or hazardous smoke exposure. Modified suppression actions must be in coordination with the assigned and local fire response jurisdictions. Oregon Department of Forestry and CAL FIRE must be included as supportive signatories to this significant proposed management action. Firefighting resources including the direct costs to implement this strategy must be disclosed to the public and those costs compared to a full suppression strategy within these jurisdictions.

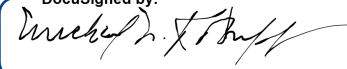
We appreciate the opportunity to comment on the Draft RMP and EIS. We look forward to further discussing these important topics in our role as a Cooperating Agency. Please contact both James Smith and Elizabeth Nielsen using the contact information below:

Elizabeth Nielsen
Deputy County Administrator
(530) 842-8012
enielsen@co.siskiyou.ca.us

James Smith
Agricultural Commissioner/Sealer
(530) 841-4033
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Sincerely,

DocuSigned by:



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Michael N. Kobseff

Chair, Board of Supervisors

cc: Assemblywoman Megan Dahle
Senator Brian Dahle
Congressman Doug LaMalfa
Congressman Cliff Bentz
Jackson County Commissioners
Rural County Representative of California (RCRC)
Shaw Yoder Antwih Schmelzer & Lange