

Appendix G: Alternative Sent by the Karuk Tribe

Karuk Community Health Clinic 64236 Second Avenue Post Office Box 316 Happy Camp, CA 96039 Phone: (530) 493-5257 Fax: (530) 493-5270	Karuk Tribe  Administrative Office Phone: (530) 493-1600 • Fax: (530) 493-5322 64236 Second Avenue • Post Office Box 1016 • Happy Camp, CA 96039	Karuk Dental Clinic 64236 Second Avenue Post Office Box 1016 Happy Camp, CA 96039 Phone: (530) 493-2201 Fax: (530) 493-5364
--	--	---

March 5, 2015

Patricia A. Grantham, Forest Supervisor
Klamath National Forest
1711 S. Main Street.
Yreka, CA 96097

SUBJECT: Westside Fire Recovery

Ayukii Mrs. Grantham:

We are submitting this Karuk Alternative to the Westside Recovery Project as per our discussion at the Government to Government Consultation meeting on February 19, 2015.

This alternative reflects the Karuk Tribe's management vision of restoring fire to its rightful place on the landscape where it will serve to protect river communities and cultural resources. Tribal staff in several disciplines, including cultural practitioners, fire and fuels, watershed restoration, water quality, fisheries, and GIS were involved in this work. We do not agree with the assertion that salvage harvest as proposed in the existing alternatives of the Westside Recovery project is in the best interest of our communities for safety reasons or otherwise. We support salvage harvest along strategic ridges, and adjacent to communities with the idea fire-fighter safety in mind, particularly in order to implement underburn treatments and to protect

1 of 2

communities in managed fire scenarios. This alternative allows for roadside hazard treatments along class 3, 4 and 5 roads that are well-traveled and serve as important access/egress routes, and those class 1 and 2 roads that are needed for strategic fuels reduction projects to be used in the reintroduction of fire on the landscape. You may notice that there are no site prep and plant units displayed on these maps. This is consistent with the comments we provided during scoping asserting that wide-scale planting of conifer species is unwarranted and contrary to our management vision. Additionally we added several fuels units to this alternative. Some of these are linear treatments for the protection of private property, some are additional ridge top treatments for the reintroduction of landscape-scale fire, and others are large underburn treatment units to allow for managing wildfire for resource benefits where it poses little threat to communities.

We officially request that this Karuk Alternative be included in the draft EIS of the Westside Recovery Project. We feel the community should have the opportunity to review and comment on an alternative that reflects Karuk Tribal values. Earl Crosby has been designated by Tribal Council to be the initial point of contact for this project. If you have any questions or would like to discuss this alternative in further detail, please contact him at 530-469-3454 or ecrosby@karuk.us to continue Government to Government Consultation. We fully expect that the consultation that was initiated on February 19, 2015 will continue through the life of this project.

Yootva,

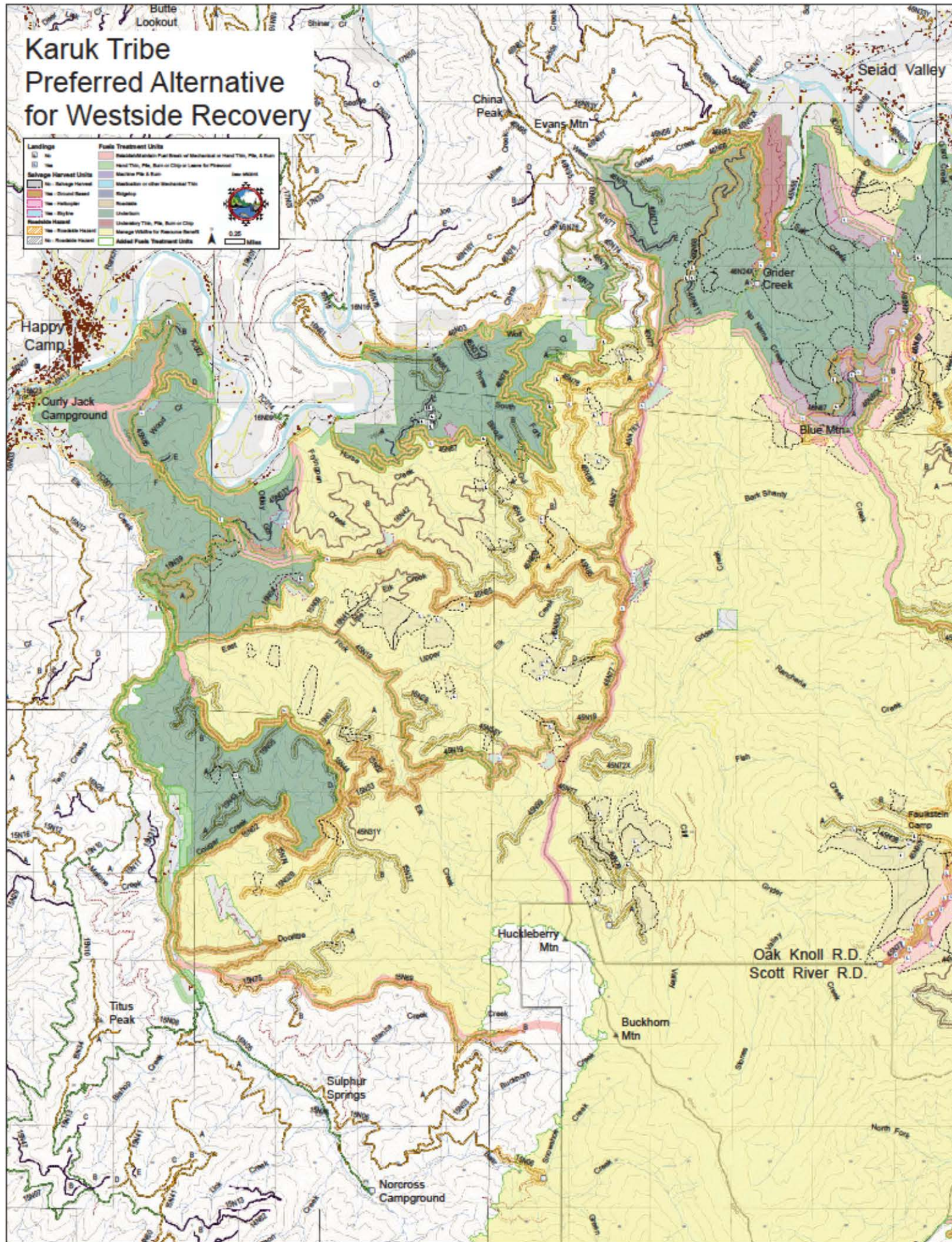


Robert Super

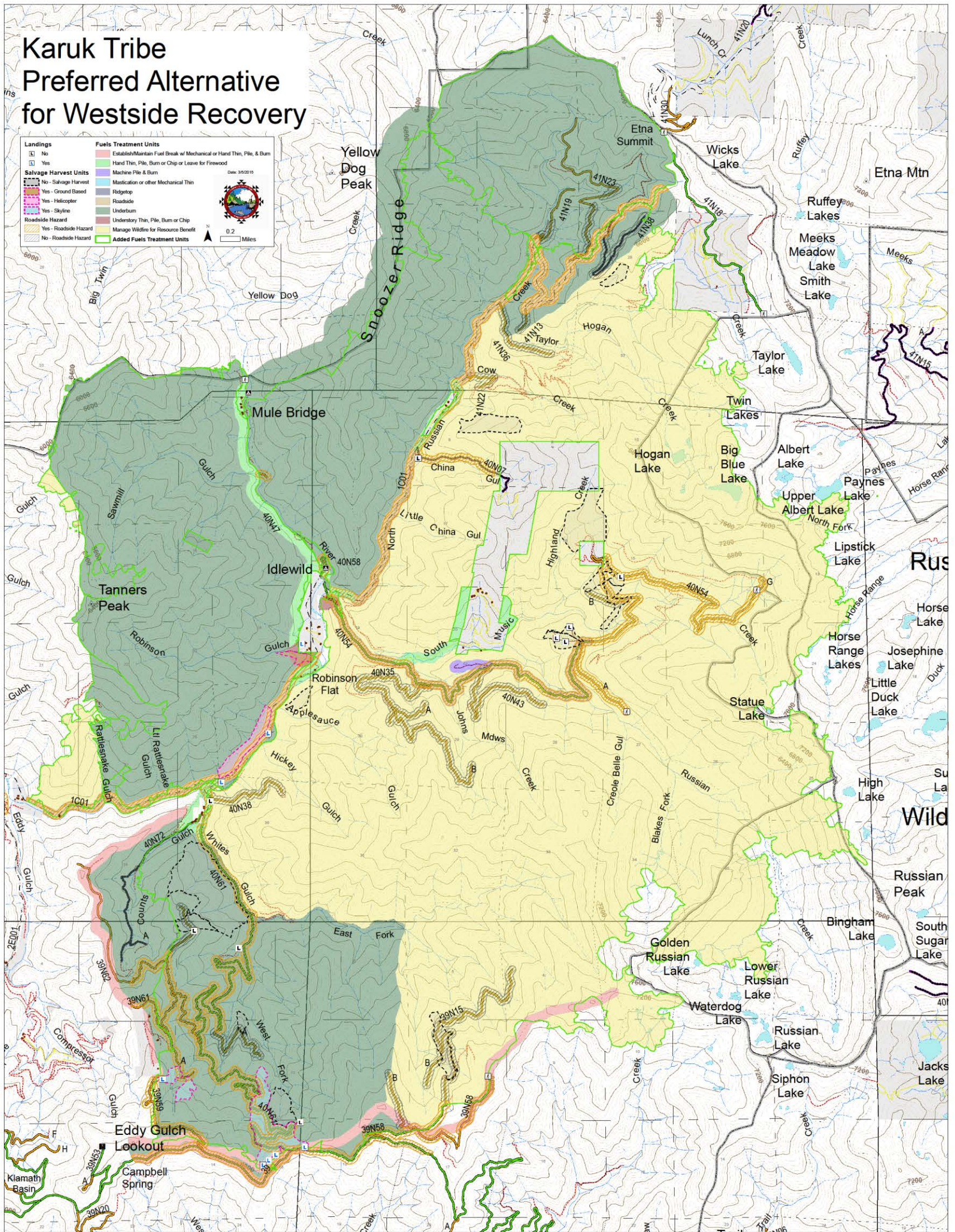
Karuk Tribe
Vice Chairman

Cc: Randy Moore, Regional Forester
Robert Goodwin, Regional Tribal Program Manager

(This Page Intentionally Left Blank)







Karuk Alternative

The Karuk Tribe is a federally recognized Indian Tribe (73 Fed. Reg. 18,535, 18,544 (April 4, 2008)) occupying aboriginal land along the middle course of the Klamath and Salmon Rivers in Northern California. The Tribe's Aboriginal Territory has been previously mapped and includes an estimated 1.38 million acres, within the Klamath River Basin. This Territory is the land base that was utilized in the process of receiving a determination of Tribal recognition. Nearly all of The Karuk Aboriginal Territory is located concurrent to lands administered by the USDA Forest Service's Klamath and Six Rivers National Forests. The Karuk Tribe values the interests and wellbeing of the Karuk People. The values associated with this wellbeing are primarily health, justice, economic security, education, housing, self governance, as well as the management and utilization of cultural/natural resources within and adjacent to the Karuk Aboriginal Territory Tribal members continue to utilize the cultural/natural resources throughout the territory. There are numerous undisclosed sacred sites, gathering areas, hunting camps and fishing spots and other prehistoric, historic, and contemporary use areas scattered across the entire landscape. Tribal People continue to maintain a unique relationship with the land and value many resources as sacred. This area has been occupied and traditional uses have continued since time immemorial.

As a result of government to government consultation between the Karuk Tribe and the Forest, the Karuk Tribe provided an alternative that is responsive to their management vision of restoring fire to its rightful place on the landscape where it will serve to protect river communities and cultural resources. Utilizing the Karuk Tribe Department of Natural Resources Eco-Cultural Resources Management Plan, Western Klamath Restoration Partnership concepts, which the Karuk serve as co lead.. Specific treatments are proposed in areas of the Happy Camp Complex and Whites fires. The Karuk Tribe does not agree with the assertion that salvage harvest as proposed in the existing alternatives of the

Westside Fire Recovery project is in the best interest of communities and contrary to the Karuk Tribe's management vision. The Karuk Tribe also does not believe the current situation warrants the Emergency Determination Request and Alternative Arrangements Request as it is a barrier to true collaboration and coordination.

The Karuk Alternative focuses on the cost savings from reduced fire suppression expenditures over time. By creating fuelbreaks around communities and implementing strategic prescribed burns in the Wildland Urban Interface wildfires burning late in the fire season can be allowed to burn and achieve resource benefits while reducing fire suppression costs. The Karuk Alternative still provides a significant portion of merchantable timber for area mills (roughly 35% of the preferred alternative), while minimizing the impacts of these harvest activities by concentrating them along key access routes and ridgetop fuelbreaks.

The Karuk alternative allows for roadside hazard treatments along class 3, 4 and 5 roads that are well-traveled and serve as important access/egress routes, particularly, in an emergency and those class 1 and 2 roads that are needed for strategic fuels reduction projects to be used in the reintroduction of fire on the landscape. No site preparation and planting units are proposed. Several fuels units are added to those proposed in other alternatives; some are linear treatments for protection of private property, some are additional ridgetop treatments for reintroduction of landscape-scale fire, and others are larger underburn treatment units to allow for managing wildfire for resource benefits where it poses little threat to communities. This alternative was received in time for inclusion in appendix G of the draft EIS with a request for public comment but not in time for detailed study before the draft EIS was published.

The following is a numerical description of this alternative as provided by initial analysis of the maps that display proposed treatments and data made available by the Karuk Tribe.

Salvage Harvest (about 3,560 acres of units)

This alternative proposes salvage logging treatments on about 3,560 acres of salvage units on Forest lands in the Happy Camp and Whites fire areas. Based on Forest analysis of the number of acres that will actually be harvested within each salvage unit (used for other alternatives in the DEIS), actual harvested acres are expected to be about 2,140. This decrease in harvested acres is a result of subtracting out the riparian reserve acres and the acres of trees that were not fire-killed within each unit.

Table 1: Acres of treatment proposed in the Karuk alternative by logging systems

Logging System	Happy Camp Complex Treatment Acres (and acres within salvage units)	Whites Fire Treatment Acres (and acres within salvage units)	Grand Total Salvage Treatment Acres (and acres within salvage harvest units)
Ground-based	170 / (285)	9 / (15)	179 / (299)
Skyline	1,095 / (1,825)	102 / (170)	1,197 / (1,995)
Helicopter	727 / (1,211)	34 / (57)	761 / (1,268)
Total Treatment Acres (and acres within units)	1,992 / (3,320)	145 / (242)	2137 / (3,562)

Roadside Hazard Treatments (along about 221 miles within the Happy Camp fire area and 44 miles within the Whites fire area)

This alternative includes roadside hazard treatments, especially on maintenance level 3, 4 and 5 roads but also on some maintenance level 1 and 2 roads within the Happy Camp complex and Whites fire-identified project areas. Acres associated with these treatments are about 9,730 acres in the Happy Camp complex area and 1,955 in the Whites fire area.

Hazardous Fuels Treatments

Underburn (prescribed burn) acres in this alternative include the 11,426 acres in Happy Camp and Whites fires areas proposed by the Forest in alternative 2 plus an additional 19,455 acres proposed by the Karuk for a total of 30,881 acres. Fuel management zones include the ridgetop treatments proposed by the Forest in alternative 2 (3,941 acres) plus about 1,234 additional acres in the Happy Camp complex fire area proposed by the Karuk. Also added to the fuel management zone acres are those proposed by the Karuk as hand thinning, piling, burning, chipping or leaving for fire wood for an additional 161 acres in the Happy Camp complex area and 55 acres in the Whites fire area; fuel management zone acres total to about 5,391 acres. (Some of these acres may be in the wildland urban interface zone; the number of acres in this zone will be determined based on further analysis of the maps and acres of fuels treatments will be reallocated based on this analysis.) In the Happy Camp complex area, fuels will be treated on the roadsides in 3,012 acres as proposed by the Forest in alternative 2 plus an additional 1,774 acres proposed by the Karuk for a total of 4,786 acres in the Happy Camp complex area. In the Whites fire area, about 807 acres of roadside fuels treatments are proposed both in the Forest's alternative 2 and this Karuk alternative so the total number of acres of roadside fuels treatments is 5,593 acres. In addition, the Karuk alternative proposes that,

on about 132,830 acres in the Happy Camp complex and 32,875 acres in the Whites fire area, future wildfires shall be managed for resource benefits.

Table 2: Karuk alternative fuel treatment acres by treatment type

Treatment Type	Happy Camp Complex	Whites Fire	Grand Total
Wildland Urban Interface	1,197	413	1,610
Fuels Management Zones	4,419	972	5,391
Roadside Fuels Treatments	4,786	807	5,593
Prescribed Burn (underburn)	13,333	17,548	30,881
Grand Total	23,735	19,740	43,475

Site Preparation, Planting, and Release (none for Happy Camp and Whites fire areas)

Site preparation, planting, and release are not proposed in this alternative.

Connected Actions

Road Access

As with other alternatives, project access will require the use of National Forest Transportation System roads and county roads. There will be no roads proposed to be added to the National Forest Transportation System as a result of this project in the Karuk alternative. No new temporary roads are proposed to be constructed, and no miles of temporary roads on existing roadbeds are proposed to be used for project access.

Table 3: Miles of road access for the Karuk alternative

Type of Road Access in Miles	Happy Camp Complex	Whites Fire	Grand Total
Forest System, County, and State	353	63	416
New Temporary	0	0	0
Temporary Roads on Existing Roadbeds or Routes	0	0	0
Temporary Road on Existing Roadbeds	0	0	0
Re-open Decommissioned Roads	0	0	0
Total Temporary Roads	0	0	0
Grand Total	353	63	416

Landings

Eighty-seven landings are proposed in the Karuk alternative, 79 in the Happy Camp complex and eight in the Whites fire area, to facilitate implementation of treatments. Thirty-two of these are existing landings, 30 in the Happy Camp complex and two in the Whites fire area; 55 are new landings (49 for Happy Camp complex area and six for the Whites fire area). Of the existing landings, 12 are to facilitate ground-based yarding (all in the Happy Camp complex area) and 20 are for helicopters (18 in the Happy Camp complex area and two for the Whites fire area). Of the new landings, six are for ground-based yarding (five in the Happy Camp complex area and one in the Whites fire area). Twenty-nine new landings (all in the Happy Camp complex area) are for helicopters. Twenty

new landings are for skyline yarding; 15 of these are in the Happy Camp complex area and five are in the Whites fire area.

DRAFT