



March 25, 2019

Patricia Grantham
Attn: Maija Meneks
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Fort Jones, CA 96032

Re: East Fork Scott Project Environmental Assessment

Greetings,

Thank you for considering these comments from the Klamath Siskiyou Wildlands Center (KS Wild), the Klamath Forest Alliance (KFA) and the Environmental Protection Information Center (EPIC) regarding the East Fork Scott Project in the Salmon/Scott Ranger District.

Our suggestions for project implementation are as follows:

1. Please limit commercial thinning in Riparian Reserves to stands comprised of existing second-growth plantations. Please do not target mid-to-late seral Riparian Reserves for logging and yarding activities.
2. Several places in the EA indicate that the Forest Service may log “larger trees” to reduce the risk of “crown fire.” Please note that in this highly roaded checkerboard land ownership project area many trees (including many large trees) are “near” roads or private land. The project area is currently in severe deficit for large-diameter trees and the risk of stand replacing fire can best be reduced by density treatments that target young small-diameter trees while retaining the few remaining larger-diameter conifers on the landscape. Please note that in the Thom Seider FEIS (page 343) both the Klamath National Forest and the Environmental Protection Agency acknowledge that the diameter of conifer trees acts as a “measure of resistance to fire.” Hence the forest resiliency goals of the East Fork Scott project may be best met by retaining such trees where they still exist in the project area.

3. We agree with the finding on page 5 of the EA that conifer density is particularly a problem in early and mid seral stands in the project area. Hence we support prioritizing those stands for treatment and retaining, rather than logging, older seral stands.
4. As acknowledged on page 20 of the EA “mistletoe is a valuable component of stand structure.” The intentional targeting of mistletoe trees providing desirable stand structure and wildlife habitat should be avoided.
5. Page 27 of the EA indicates that “[r]etention of some legacy conifers would be included in prescribed treatments” for oak woodlands and meadows. Why is the agency only proposing to retain *some* of the legacy conifers? How many legacy trees will be removed to facilitate oak woodland and meadow treatments?
6. Page 29 of the EA indicates that the Forest Service will not be addressing the primary impact to wet meadows and riparian health in this planning area: namely, continued cattle grazing of these areas. Please note that page 19 of the November 2018 Botanical Resources Report acknowledges that “[g]razing activities may effect sensitive plant populations from trampling, habitat disturbance, and by acting as vectors for noxious weed spread.” By refusing to address continued significant impacts to wet meadows and riparian health from permitted grazing the KNF undermines attainment of the project purpose and need.
7. It is unclear if the KNF intends to remove (rather than fell and leave) roadside hazard trees within the Late Successional and Riparian land use allocations. It is not appropriate to remove large-diameter down woody debris from reserve land use allocations.
8. We agree with the finding on page 47 of the EA that “[t]emporary roads and landings are not expected to meet desired conditions for soil organic matter and soil structure.” The project area is already replete with logging roads and log landings. Please focus project activities where this infrastructure already exists rather than building yet more logging roads and landings.
9. Please do not include regeneration (GTR) logging as part of this project. Proposed regeneration logging units remove, rather than restore, forests and increase the amount of acreage covered by second-growth plantations with increased fire hazard. Regeneration logging harms wildlife, watershed and fire resiliency objectives.

Conclusion

Thank you for proposing a project that thins small-diameter ground and ladder fuels while reducing road density in the planning area. We believe that project objectives could be best met by providing full riparian reserve protections, avoiding new road construction, and retaining large-diameter trees and thinning (rather than removing) forest stands in the project area.

Please ensure that we are on your mailing list to receive hard copies of all forthcoming documents regarding this project.

Best regards,



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