

Jeff Stone

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The following are my comments on the Bear Country Project.

This project has features that can be separated into two categories: 1) enhancement of community fire safety and ingress/egress, prescribed fire, and non-commercial thinning; and, 2) commercial logging in late successional forests.

I support proposals that protect communities from wildland fire, implement prescribed fire, and thin the many plantations that are scattered across the Salmon River country. Projects that cross boundaries between public and private lands are most effective, especially those that focus on structures and their immediate surroundings. Hardening of structures can have long-lasting positive effects, in contrast to fuelbreaks, which require continuous maintenance.

However, old-growth logging is actually counter-productive to forest health and community protection, on many levels.

As I write these words, we are in the midst of a severe heat wave; high temperatures in Yreka are predicted to be over 100° every day for the next week at least, topping out (for the time being) at 109°. Global warming is a fact. Over the past few years we have seen wildfire in northern California on an unprecedented scale. During this climate crisis, fires are going to burn no matter what we do; protecting our communities is essential, and projects that accomplish fuels treatments within the wildland-urban interface must be prioritized.

Logging the oldest, most fire resistant trees will protect neither communities at risk, nor late successional forests. The Klamath's fire history has consistently shown that the inevitable large fires that occur in these relatively intact forests will burn at mixed intensities, with some areas of high intensity (creating snag forests) interspersed with lower intensity burns. Removing large, fire resistant old-growth trees will not prevent large fires; on the contrary, opening up the canopy will cause these stands to dry out faster and be more exposed to wind, which, during the extreme weather events which are becoming more common, will cause the remaining stand to burn with greater intensity.

Spotted owls do quite well in unlogged mixed intensity burned areas, roosting in the lightly burned areas while foraging in the adjacent snag forests (see "Occupancy of California Spotted Owl sites following a large fire in the Sierra Nevada, California" and "Disentangling Post-Fire Logging and High-Severity Fire Effects for Spotted Owls"). Considering this fact, logging spotted owl territories to save them from fire doesn't make a lot of sense.

Carbon sequestration is an issue that affects climate change. Removal of old-growth trees from the forest dumps carbon into the atmosphere at an alarming rate. While some of the

resulting wood products find their way into (temporary) storage in buildings and other structures, a majority (by some estimates, 75%: see “Meeting GHG reduction targets requires accounting for all forest sector emissions”) of the carbon from harvested trees is lost to the atmosphere when slash and mill waste is burned. Old-growth logging exacerbates climate change, which will in turn cause more catastrophic effects to forests and communities in the future.

New road construction should not occur without a Travel Management Analysis. The Forest Service already has much more road mileage than it can possibly maintain. Roads fragment wildlife habitat. The Klamath’s refusal to perform a Subpart A Travel Management analysis, either on a Forest-wide or a project-wide basis, is not sustainable ecologically, nor is it legally defensible. Building any new roads, whether open to the public or not, must not occur until this essential analysis is complete.

While it is tempting to include commercial logging as a cash cow to pay for the rest of this project, it is not desirable. The harm that will be done to wildlife habitat, future fire management options, and our climate will outweigh any benefit to local communities.

To summarize:

- Refocus the Bear Country Project on community fire safety, plantation thinning, providing escape routes for local residents and implementing prescribed fire adjacent to homes and communities on the Salmon River. Include private lands and structure hardening in the project where possible.
- Retain all large, fire resistant trees throughout the project area, except where they pose a risk to human safety. The old-growth logging currently proposed in the Bear Country Timber Sale would make these forests more flammable and would further jeopardize the survival of the spotted owl.
- Cancel all new road construction and road re-construction until a travel management analysis is completed, at least on a project-wide basis.
- Manage Wild and Scenic River corridors specifically to enhance and maintain the outstandingly remarkable values which was the intent when these areas were established. These include the scenic, recreational and biological values that would be impacted by the current commercial logging proposals.
- The proceeds from logging old growth should not be counted on to pay for the rest of the project. Fire safety for local communities is a desirable outcome in itself that should not be dependent on timber receipts.

Thank you for this opportunity to comment.

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