



Drew Stroberg, District Ranger
Goosenest Ranger District
Klamath National Forest
37805 Highway 97
Macdoel, CA 96058

June 20, 2022

Dear Mr. Stroberg,

The California Deer Association (CDA) is a wildlife conservation nonprofit dedicated to supporting California deer and other wildlife species through habitat restoration projects. From its inception in 1996, CDA has developed diverse partnerships with federal, state, local, and private entities to increase the pace and scale of landscape-level restoration projects that benefit habitat resilience, biodiversity, and public safety. CDA works throughout California on a variety of projects that strengthen forests, watersheds, meadows, native vegetation, wildlife migratory routes, and culturally significant sites.

CDA is proud to support the Antelope and Tennant Fire Recovery Project proposed by our federal partner, the USDA Forest Service's Klamath National Forest (KNF). In 2021, nearly one-third of the total acreage of the Goosenest Ranger District burned in the Tennant and Antelope Fires, with over half of the burned area demonstrating high burn severity characteristics. The consequence of these fires is that critical ecosystem services provided by the affected forests, meadows, and grassland habitats have been severely diminished and will further degrade if post-fire impacts to the landscape are not mitigated. CDA agrees with the KNF Goosenest Ranger District that the proposed action is essential to restoring the affected environment to the desired condition for the benefit of the communities and wildlife species that depend on them.

In the face of the growing wildfire crisis in California, in which every year sees a new record for largest fire in recorded state history, there is much debate regarding the appropriate strategies to manage post-fire landscapes. Fire, by natural causes or tribal land management, is well understood to be a key ecological component of the native landscapes across the state. Historical evidence demonstrates that pre-settlement fires typically burned across an area with varying intensities, creating a successional mosaic and supporting greater biodiversity of plant and animal species on all levels of the food chain. This critical disturbance regime was interrupted as a result of Euro-American settlement in California. Consequently, heavy fuel loading across the landscape, exacerbated by the growing impacts of human development and climate change, is causing the geographic scale and severity of contemporary wildfires to vastly exceed those of pre-settlement fires.

This trend was unfortunately demonstrated by both wildfires that impacted the Goosenest Ranger District in 2021. According to KNF, the forests within the district had not experienced a significant fire cycle in over 100 years, and when fire returned to this heavily fuels-laden landscape it burned at high intensity across 57% of affected area, meaning over 55,000 acres lost between 75-100% of their vegetation. The RAVG map prepared by KNF resource specialists demonstrates that these fires did not burn in a way that created patches of early seral habitat among in-tact late-successional habitat, but instead created large contiguous swaths of denuded habitat. Subsequently, the direct and indirect impacts of the Tennant and Antelope Fires should not be considered a natural or benign continuation of the ecology of the affected habitats, nor should a hands-off approach be considered the appropriate action for managing the post-fire landscapes.

CDA agrees with the intent of the Forest Service's Proposed Action for the Antelope and Tennant Fire Recovery Project to enhance public safety from the imminent and future hazard posed by the post-fire



landscape conditions; to restore structure, function, and resiliency to the affected habitats critical for supporting the native biodiversity of the region; and to facilitate the reintroduction of fire to the landscape in a way that is safe and beneficial for humans and wildlife alike. We also agree that the methodologies and prescriptions proposed to achieve these objectives exceed industry standards, incorporate empirical evidence into their design, and thoroughly consider the needs of multiple resources, including public safety, water quality, and special-status species found within the project area like Northern Spotted Owl (NSO). In the sections below, we highlight the actions proposed for this project and offer the logic behind our support for them.

Hazard Tree Removal and Reforestation

- Mitigated imminent hazard (i.e., falling trees and limbs) and future hazard (i.e., debris flows, heavy fuels accumulation) and enhanced safety of forest visitors and neighboring communities
- Mitigated risk of noxious weed introduction and spread along unvegetated ground
- Enhanced slope stability and mitigation of sediment delivery to waterways
- Increased carbon sequestration
- Restored scenic quality of forested landscapes

Reforestation (including Site Preparation) of the Forest Interior

- Restored critical nesting, nursery, and forage habitat for a variety of native wildlife such as predators, ungulates, migratory birds, and pollinators
- Improved habitat connectivity across fire-impacted landscapes
- Mitigated future wildfire hazard and enhanced safety of forest visitors and neighboring communities
- Enhanced slope stability and mitigation of sediment delivery to waterways
- Increased carbon sequestration

Meadow and Riparian Restoration

- Restored critical wildlife habitat for aquatic and terrestrial species
- Improved regeneration of native floral diversity
- Improved slope stability and sediment delivery to waterways
- Improved hydrologic recharge, filtration, and downstream flow of water from meadows

Native Grass Seeding

- Restored critical forage habitat for a variety of native wildlife such as black bears, elk, ungulates, migratory birds, and pollinators
- Mitigated risk of noxious weed infestation across unvegetated ground
- Improved slope stability and sediment delivery to waterways
- Increased carbon sequestration

Dwarf Mistletoe Sanitation

- Enhanced forest health and regeneration of lodgepole and ponderosa pines
- Reduced canopy mortality and heavy fuels accumulation
- Increased carbon sequestration

The past five years have brought catastrophic wildfires to northern California that do not mimic the historic disturbance regime. These fires have significant and long-term negative impacts on our land,



water, and wildlife resources. The increasing footprint of large, high-severity wildfires across the state is resulting in unsustainable cumulative impacts that are unable to be fully mitigated through passive management, including habitat fragmentation, sedimentation to waterways critical for fisheries and drinking water, and fuels accumulation that threaten public safety and infrastructure. Therefore, there is an urgent need to proactively restore the critical wildlife, botanical, and culturally significant habitats found in the project area. CDA supports this proposal and agrees the proposed actions will effectively mitigate post-fire impacts and restore the affected environments for the benefit of the people that cherish them and the wildlife that depend on them.

Sincerely,



Dale MacDougall, State Wildlife Program Director