

Scott Blower, District Ranger  
Wild Rivers Ranger District,  
26568 Redwood Highway  
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Re: Slater Re-Open Scoping public comment

August 13, 2022

I have major concerns that the Slater Re-Open project will decimate the early seral plant communities that have rebounded in abundance following the 2020 Slater Fire. Cutting, logging and dragging snags through native wildflowers and intact plant communities in an area renowned for its botanical diversity will negatively impact pollinator habitat, wildlife habitat, bird habitat, fungi & mycorrhizal communities, and set back fire recovery.

There is no need to create this disturbance 200 feet from roads. Even the California Department of Transportation (Caltrans) only cut snags from 50' of the Highway 96 following the Slater Fire, and Highway 96 is a major highway and throughfare; whereas, the roads slated for 200' of snagging in the Slater Re-Open project are little used, backcountry roads where forest visitors are warned to be prepared for unexpected hazards, as they are not county or state-maintained roads. There is a lower expectation for the maintenance of backcountry dirt roads than paved state highways, and yet the Wild Rivers Ranger District is planning to snag 150' further from these little used roads than even Caltrans did on Highway 96. This is just a timber grab and a handout to the timber industry, and is not about public safety. Public safety can be accomplished with minimal snagging in some select places where trees are leaning into the road, and the rest should be allowed to fall naturally, as nature has done for as long as wildfires have burned.

Although snags can and do fall in roads, snags can also remain standing as important wildlife components for decades following a fire. The assumption that snags will fall right away is false. All one has to do is look at the nearby 2002 Biscuit Fire to see that firsthand. The majority of the snags from the Biscuit Fire are still standing 20 years later, and even many snags that have re-burned in the Klondike and Chetco Bar Fires, have also remained standing, even after reburning years after the Biscuit Fire.

The Slater Re-Open Scoping Letter fails to mention anything about how the project will work to protect intact native plant communities, sensitive/threatened/endangered species, or prevent the spread of noxious weeds that contributes to the decline of intact native plant communities. The action of removing snags is highly disturbing to soils, and soil disturbance is the number one way that noxious weeds, invasive species, and non-native plants spread. The logging that has already occurred in the Slater Fire area on the Wild Rivers District has already contributed greatly to the spread of non-native plants, including Dyer's woad, St. John's wort, bull thistle, star thistle, knapweed, cheatgrass, and more. Further soil disturbance through the Slater Re-Open project will trigger more spread of more non-native plant species and contribute to

further declines in intact native plant habitat. This project will destroy habitat. Currently many of the roads in the Slater Re-Open project are full and vibrant with native wildflowers and grasses that are going to seed right now in August and will continue to grow if not damaged by logging and heavy equipment.

The Slater Re-Open project will set back biodiversity in the Slater Fire area. Wiping out whole patches of native wildflowers through dragging logs and compaction and damage from heavy equipment. The Slater Fire area experienced a beautiful super bloom this year in many parts of the fire, including along roadsides that hadn't yet been logged. The Klamath-Siskiyou region is renowned for its incredible plant diversity, and some of the most impressive displays of wildflowers follow wildfires in our region. The native plants are adapted to grow fast and grow big following fires, to produce abundant flowers and seed to rebuild the soil seed bank in the post-fire environment.

Many people are familiar with the super blooms in southern California that are triggered by an increase in spring rain; however, in our part of the world, here in the Siskiyou Mountains, super blooms are triggered by wildfire. Many different aspects of wildfire can trigger seed germination and super blooms: direct heat, ash, PH change, light, etc. These effects can happen 1-5 years from a fire, depending on the species and its particular growth patterns and phenology. What stops a super bloom dead in its tracks is disturbance. In southern California people are asked not to even walk into a super bloom for fear of disturbing the wildflowers; however, the Wild Rivers Ranger District wants to approve logging, heavy equipment and soil disturbance in a super bloom.

Roads that have experienced both low and high severity fire in the 2017 Abney (Miller Complex) Fire (Siskiyou Mountains Ranger District) were never salvage logged, and the roads have remained safely open with no issues for the past five years following the fire. Each of the following roads is open, unsalvaged, un snagged, and fully in use with no post-fire roadside treatments of any kind:

- Whisky Peak Road (FS Road 1035) to Whisky Peak and the Whisky Peak Botanical Area -- no salvage along roads
- Cook and Green Pass Road to the Cook and Green Pass Botanical Area (FS Road 1055) -- no salvage along roads
- Middle Fork of the Applegate River Road (FS Road 1040) -- no salvage along roads
- Dutch Creek Road (FS 1065) -- no salvage along roads

As someone who lives in the area of these roads, and lived through the Abney Fire, I have seen firsthand that these roads are fully passable and safe without snagging. The vast majority of the snags are still standing after the Abney Fire, five years later, and only some light chainsaw work has been needed after the winter to clear the roads, which is no different from high elevation roads in the snow zone anyways.

This proves that not all roads need to have post-fire treatments following fires in order to be safely used afterwards. The same can and should be true for the Slater Re-Open project.

This is going to be a largely publicly subsidized project, with public money and taxpayers like me footing the bill, so there needs to be a clear and decisive benefit to the public for it justify the use of public money. There is not an efficient use of public money that I can see when you really don't need to do this work for people to safely use these roads.

Clearly the fact that these roads are ALREADY OPEN, shows that the roads are, in fact, currently safe for public use. If they weren't safe roads you wouldn't have them open. The name of the project is a farse, as the roads are already open and the fire area is already open. There is no need for logging 200' on either side of the road, when people are already safely driving through and recreating off of these roads. People do all kinds of unsafe recreation on the Wild Rivers Ranger District: kayaking, rafting, shooting, OHVing, rock climbing, etc., and those people take those risks. Driving through roads that are currently open and deemed safe for driving is a risk that the public takes on any Forest Service road at any time. Snags fall on roads outside of fire areas, and green trees are usually the ones that come down in snow zones because they have all the leafy limbs that hold the snow. Publicly subsidizing this roadside logging is just not justifiable unless it is limited to trees that actually have the physical capacity (length, lean, etc.) to fall exactly into the road. Otherwise, you are just wasting our hard eared taxpayer money. There's no public benefit to using taxpayer money to yard these trees. At the very least you should only be subsidizing the felling and not the yarding. There's no public benefit to yarding the crappy, rotting logs.

The scoping letter mainly focuses on snags within the Slater Fire area and fails to clarify what the FMZs are going to look like on the ground in areas outside the Slater Fire footprint, such as the 4803 road to Sanger Peak. There is no indication if the FMZs will be commercial or non-commercial, or what the specific treatments will be. This lack of information in the scoping notice is a glaring omission or obfuscation.

Road 4803 to Sanger Peak should be dropped from the project as it is outside the Slater Fire area and is an important area for Brewer's spruce and other important native plant species. Including the 4803 road in the Slater Re-Open project doesn't meet the Purpose and Need for the project since it is outside the fire footprint.

Please do site specific analysis rather than an arbitrary 200' distance. I don't believe you should be doing any snagging beyond what is imminently going to fall directly into the road; however, you could at least limit the distance to 50' in order to reduce soil disturbance, impacts to biodiversity, and the taxpayer burden

You don't address adjusting treatments for different land use allocations that have different needs and concerns. The following land use allocations should be given special standing and be given specific consideration that is in line with their designation.

- Riparian Areas
- Special Wildlife Sites
- Late Successional Reserves (LSR)
- Non-motorized Backcountry Areas
- Botanical Areas

There was no mention of the Endangered Franklin's bumble bee in the Scoping letter for the Slater Re-Open project. Franklin's bumble bee should be surveyed for throughout the project area prior to approval of the project. The project area is part of the historic range for this Endangered bumble bee. Without surveys during the peak of early summer wildflower blooms, you will not know if you are damaging Franklin's bumble bee nests in the ground or habitat above ground.



Suzie Savoie

