



MOUNT SHASTA BIOREGIONAL ECOLOGY CENTER

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Rachel Smith
Klamath National Forest Supervisor
1711 S. Main St
Yreka, CA 960697
rachel.c.smith@usda.gov

Lisa Bousfield
Team Lead
Klamath National Forest
1711 S. Main St
Yreka, CA 96097
lisa.bousfield@usda.gov

Drew Stromberg
District Ranger
Goosenest Ranger District
37085 Highway 97
Macdoel, CA 96058

Via: email to: lisa.bousfield@usda.gov and rachel.c.smith@usda.gov

Re: Antelope Tennant Fire Recovery Project EA

Mount Shasta BioRegional Ecology Center (MSBEC) would like to thank the Goosenest Ranger District for the opportunity to comment of the Antelope Tennant Fire Recovery Project.

We appreciate all efforts that plan to restore riparian and meadow habitat and agree with the prescribed methods. We agree with the native grass seeding plans and the methods.

We have signed comments submitted by KS Wild, but would like to submit these additional critical comments.

These comments will focus on:

- Hazard tree logging
- Snag retention
- New road building
- Dwarf Mistletoe sanitation logging
- Cattle grazing allotments
- Cumulative impacts
- Industrial activity near Medicine Lake Highland (MLH)

Hazard Tree Logging

We believe hazard tree logging justification needs to be based on road maintenance levels, not on the arbitrary fact that a tree can fall onto a road from some distance above or below the road. Roads that are seldom traveled have an incredibly low statistical probability of being a hazard to the public.

Fire crews entering the area would be properly prepared to remove trees if any blocked their passage.

There is no assurance of safety in wild places like our National Forests. An entire segment of users in National Forests have traveled into forests explicitly for the wildness.

Trees that do fall on low maintenance priority roads are often cleared by the public, long before Forest Service employees find them, and are collected for firewood. We believe that public use of these trees for firewood should continue to be favored over industrial logging of backcountry roadways.

We would like to incorporate by reference the comments made by Jeff Stone and note that they should be included in the scoping record of this project. We attached a copy in our email.

Live trees should not be felled as they pose even lower risk than dead trees.

Snag Retention

During scoping, snag retention was described at a higher tree per acre than the EA describes. We favor the level of snag retention used in scoping.

New Road Building

The MLH area makes a significant contribution to the area's groundwater and it should be protected from industrial salvage logging. We do not support the justification for new road building.

We believe that road building simply to salvage trees is more harmful to the recovery of the forest. Furthermore, should proposed salvage units be inaccessible with the current road network, the units should be removed from planned salvage acreage. No additional roads should be built.

Dwarf Mistletoe Sanitation Logging

We do not support the justification for large scale logging that focuses on trees where mistletoe is present.

Dwarf mistletoe provides many of the stand benefits (diversity, gaps, irregularity, snags and down wood) that silvicultural prescriptions are often designed to achieve. Hence the project restoration purpose and need might be better met by retaining, rather than removing, mistletoe infected trees.

We do not believe that the proposed treatment will control mistletoe and will actually lead to the possibility of spreading and increasing the range of infection.

Cattle Grazing Allotments

Nick Joslin, signatory for these comments, has family property very near the burn scar, on Butte Creek. In a short 40-year period, a massive decline in pronghorn in the area has occurred, while cattle pressures have increased. The area used to have a very large (hundreds of animals) herd that ranged the project area. Fragmentation of the habitat as well as grazing pressure from cows have left the herd essentially non-existent.

Free ranging cattle regularly cross the Soulé family fence lines from Klamath National Forest onto private property. The frequency of cattle trespass and numbers of cattle crossing to private property has increased in the last ten years.

The environmental consequences of cattle grazing allotments should be fully analyzed before active grazing allotments are re-occupied by cattle. Cattle must be excluded from meadow areas targeted for restoration if meadows are going to return to performing their important role in holding/slowing groundwater percolation and providing water for native wildlife.

The allotments should be placed on hold, as are the nearby Bray and Horsethief allotments, and analyzed as a cumulative impact to pronghorn, wolf, deer, and aquatic resources.

Cattle will play an increasing role with wolves that reside in the area (Whaleback pack). These interactions need to be minimized by mandating that cattle are grazed in fully fenced pasture/area, using fladry, and other anti-predation measures. Allowing free ranging cattle in a wolf pack's home range is an unnecessary provocation that could lead to further predation of cattle and vilification of wolves.

Cumulative impacts

It appears that large scale salvage operations have already commenced within the project boundary. There have been eleven Emergency Timber Operation plans submitted within the project area. Little Steve Timber sale, with bids open on March 23, 2023, appears to be a large-scale hazard tree sale of trees cleared during Antelope Fire operations.

It remains unclear how the cumulative analysis of work already completed or ongoing is factored into this current EA. Simply *listing* nearby projects is not a sufficient analysis of the cumulative effect of the proposed actions.

Medicine Lake Highlands

The cultural significance of the Medicine Lake Highlands cannot be overstated. The Medicine Lake Highlands were designated as a Traditional Cultural District by the US Forest Service and the National Register of Historic Places in 1999, expanded in 2005. An extensive Historic Properties Management Plan for the Highlands was completed in 2007.

Consultations with Pit River Tribe, the Klamath Tribes and the Modoc Nation are stipulated by Section 106 of the National Historic Preservation Act of 1966 (as amended, 1992).

Project areas within the boundaries of the Traditional Cultural District (called *Traditional Cultural Property* in this plan), as well activities in adjacent areas that may affect the viewshed should be clearly identified and included as subjects for consultations.

The “Antelope Fire Repair Plan” in the supporting documents stipulated the treatment for post fire suppression activities and the concern was stated that fire lines not be visible from higher elevation.

Areas from Pumice Stone Mountain to the northeast to Medicine Lake Glass Flow should not be targeted for dwarf mistletoe logging since this activity would leave clearly visible impacts. It should instead be left to naturally progress so as to avoid harming cultural resources or the viewshed of the MLH.

The proposed dwarf mistletoe logging activity is also incongruent with another plan that has been awarded funding by the Sierra Nevada Conservancy (SNC) on 3/2/23 (“Medicine Lake Volcano Forest and Fire Restoration”- a partnership between the Pit River Tribe, the Modoc Nation, Modoc NF, and Pit RCD) that will occur within the Traditional Cultural District. This neighboring project aims to thin lodgepole pine stands and create fuel breaks while also promoting sustainable

recreation, tourism, and protecting culturally significant landscapes in the headwaters of Pit and Sacramento river watersheds.

It is also part of a broader strategic plan of the SNC that focuses on “restoring healthy ecosystems in strategic locations”. Current legislation at the state level would extend the SNC boundary to include all of Siskiyou County.

We believe this nearby project serves as an example that broad stakeholder buy-in creates projects that receive overwhelming support. The Antelope Tennant project appears steered by industry interests and as a result does not appear as a favorable project to those outside of timber companies.

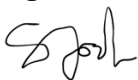
Conclusion

We do not believe that there exists sufficient scientific justification for large scale industrial salvage operations or large-scale dwarf mistletoe sanitation logging. Salvage logging leaves watersheds and landscapes damaged and unproductive. The market for salvaged timber is fleeting and unpredictable, so the fiscal justification may also prove to be insufficient.

We believe much of the landscapes need to be given the opportunity to progress through the natural process of recovery from fire. After all, much of this landscape has evolved with fire long before it was managed for economic productivity. Much of the natural forest recovery and progressions will match the compositions that are desired outcomes of industrial salvage and will not cost taxpayers anything.

Thank you for considering our comments and we hope that some middle ground can be achieved where all stakeholders have input in the management of our forests. We believe collaborative efforts will yield the best results and in this expansive project area, there is room for diverse project types that show that the Forest Service is responsive to a broad range of treatment options.

Regards,



Nick Joslin

Forest and Watershed Watch Program Manager
Mount Shasta Bioregional Ecology Center
PO Box 1143
Mount Shasta, CA 96067