**Snags**

The LRC appreciates the attention given the significance of snags within the Proposed Action, but we find the metrics for the desired condition for snags (Tables 5 and 6) inadequate. Specifically, we believe that the variation of snag occurrence and distribution needs to emphasize disturbance history much more directly. In particular there is no discussion in the assessment or LMP of the role of “double burns” or sometimes called “cleansing burns”. Burns that occur 10-30 years after an initial stand replacement fire can burn very hot as a result of the large accumulation of down fuel resulting from fallen snags that were created by the previous fire. This phenomenon results in very sparse CWD and snags may be nonexistent. The lack of snags persists for many decades until the new forest grows large enough to have trees die. These double and triple burns are likely to increase with longer, drier fire seasons driven by climate change, and the Proposed Action should describe how snags may be retained at the landscape scale given the likelihood of increased fire risk.

The use of average snags per acre in Table 5 regardless of successional stage is problematic, as it doesn’t reflect the temporal variation. It also does not address the differences between Management Areas 1-3 and 4&5. MA’s 1-3 will have pulses of snags from wildfire, prescribed fire and free ranging insects and disease. MA’s 4 & 5 will have fewer snags due to salvage activities on, suitable for timber production lands, and safety considerations for logging and prescribed burning operations. MA 5 will have lower numbers of snags from a recreation safety standpoint. Therefore, we think it would be useful to managers and for public understanding to describe the desired condition separately acknowledging the different amounts of snag habitat as a result of the different goals and objectives. We think this should be reflected in analyzing and reporting FIA monitoring snag data.

A set of figures showing the snag life cycle by PNV groups and successional stage would be of tremendous communication value for employees implementing the plan and for the public’s understanding.

We also did not find any reference to Sharon Hood’s research on the affect of non-lethal burns on pitch production. This effect has two important ecological functions. First, it makes the trees more resistant to bark beetle attacks and secondly, when a tree eventually dies the resulting snag will stand far longer as a result of the pitch content that resists rot fungi. We think this needs to be added to the assessment and in the desired condition description supporting the use of low and mixed severity prescribed fire, as well as added as a guideline for snag management.

Drafted by Dave Atkins