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First name: George

Last name: Sexton

Organization: Klamath Siskiyou Wildlands Center

Title: Conservation Director

Comments: Dear David,

Thank you for considering the following comments on behalf of the Klamath Siskiyou Wildlands Center (KS Wild), the Klamath Forest Alliance (KFA) and the Environmental Protection Information Center (EPIC). Our contact information may be found at the end of these comments. Please ensure that we are on your mailing list to receive hard copies of forthcoming NEPA and decision documents.

Our organizations would like to support a project that focuses on forest restoration and public safety, but we are concerned that the project may include actions that harm, rather than aid, forest health. In particular we believe that large diameter trees should be retained, manual fire lines are preferable to dozer lines, machine slash piling should be avoided, open road density should be reduced rather than increased and that riparian reserves should be protected from yarding activities.

Please note that the silvicultural report indicates that conifer diameters in the project area are heavily weighted towards trees that are less than 10" inches in diameter. On average there are 140 TPA that are less than 10" DBH, while there are a handful of TPA greater than 20" inches in diameter. Removing large, fire-resilient trees will have disproportionate impacts to wildlife and recreation in the project area. Project objectives can best be met by address the deleterious impacts of continued fire suppression through the removal of the vast number of encroaching small-diameter trees and the retention of larger forms of forest structure (trees, snags and down wood). Please implement a diameter limit that protects the remaining large trees from logging.

We appreciate Forest Service efforts to lower hazardous fuels levels in the WUI, restore

ecosystem structure, reduce stocking levels and restore the role of fire in this planning area. Those objectives will be inhibited by the removal of large diameter trees that are below their historic range of variability in this planning area.

The intent to log across all age classes is counterproductive ecologically and socially. The proposal to log large fire-resilient conifers that are in severe deficit in this planning area will not contribute to the social or ecological goals of the project.

Many project managers have implemented successful prescribed fire treatments without the use of dozer lines. Please implement hand lines as an alternative.

We are extremely concerned that the Forest Service is proposing to construct additional logging roads in the project area and to open (and leave open) some currently closed roads. Road density in the project area is extremely high and additional road construction will contribute to the existing significant impacts to wildlife, hydrology and soils.

We will continue to strenuously oppose machine piling activities. The impacts of machine piling on the District are significant and severe and reasonable alternatives to this practice exist.

Please do not implement "sanitation" clearcutting of native stands. This logging prescription removes, rather than restores native forests.

We are worried that Alternatives 4 and 5 are mere window dressing on the way towards and inevitable and pre-ordained decision to implement the maximum logging alternative.

It does not appear that substantive public comments can influence actual project design and implementation.

INCREASING OPEN ROAD DENSITY, EQUIVALENT ROADED AREA, AND SIGNIFICANT CUMULATIVE IMPACTS

The DEIS is replete with acknowledgements that the logging road density in the project area is already extremely high. Hence the applicable Watershed Analysis developed by

Forest Service experts recommend reducing, rather than increasing road density as a forest health measure. As acknowledged on page 7 of the DEIS the McCloud Flats WA recommends "road closures." Page 8 of the DEIS indicates that the Edson WA recommends "[g]ully stabilization and floodplain restoration which includes decommissioning roads."

Yet Forest Service timber planners are proposing 2.6 miles of permanent new logging road construction, 4 miles of temporary road construction, utilizing 6 miles of unauthorized routes, re-opening 9.2 miles of closed logging roads during the project and permanent re-opening of 3 miles previously closed roads. As acknowledged on page 71 of the DEIS these actions will result in an increase (rather than decrease) in open road density in a planning area in which road density is high.

Further, the Equivalent Roaded Area (ERA) will be exacerbated by the establishment as use of 340 log landings (DEIS page 136), thousands of acres of machine piling and the creation of 24 miles of dozer trails. DEIS page 136. These numbers are simply staggering. Significantly increasing cumulative impacts from roads, landings and dozer lines in the project area will not contribute to forest health objectives and directly undercuts the recommendations contained the agency's WAs.

No explanation is provided for why the agency is proposing to utilize tractors (in addition to excavators) for machine piling activities. See DEIS page 31.

Page 49 of the DEIS appears to allow new log landings to be established in Riparian Reserves.

Page 63 of the DEIS acknowledges the potential for increases in turbidity from "dozer lines and vegetation treatments."

Page 107 of the DEIS indicates that the Forest Service intends to authorize an unknown number of skid trails at undisclosed locations throughout Riparian Reserves.

Page 108 of the DEIS states that "[s]kid trails and landings located in close proximity to Riparian Reserves have the potential to produce and deliver sediment to aquatic and riparian habitats[hellip]"

Page 109 acknowledges that "[i]ndirect effects from timber harvest activities could include soil mobilization on skid trails and landings."

Page 109 further indicates that the agency intends to authorize 154 acres of machine piling and mastication within Riparian Reserves.

Page 110 of the DEIS establishes that Forest Service timber planners intends to allow 10 dozer line crossings of ephemeral and intermittent stream channels.

Page 111 of the DEIS reveals that the agency intends to construct 0.5 miles of new logging roads in Riparian Reserves and reconstruct an additional 0.9 miles of decommissioned/closed logging roads in Riparian Reserves.

All of these significant impacts are in addition to the already "high disturbance values for West Flats 3, Bigelow Meadow, Bundoora and Camp Watersheds [that] reflect the fact that timber harvest or fuels projects are proposed for nearly every acre of these HUC8 watersheds." DEIS page 117.

Hence Alternative 3 presents the "[g]reatest potential for negative effects to Riparian Reserves." (DEIS page 121). Including the "potential for increases in turbidity due to [Riparian Reserve] dozer lines and vegetation treatments[hellip]" DEIS page 121.

At page 135 the DEIS acknowledges that in the extensive network of proposed new landings and logging roads "[hellip]rehabilitation through decompaction and/or recontouring cannot restore the roadbed to natural conditions..." Further, the location and site-specific impacts of landings, machine piling and dozer lines are not disclosed or analyzed in the DEIS.

Page 136 discloses that "[l]andings in general will convert productive soil into compacted surface, in most cases landings will be considered detrimentally compacted. Compacted

soil[hellip]will effect hydrologic flow, soil health and porosity."

Page 136 also indicates that "[d]ozer line will compact the soil resource, displace some topsoil and displace litter and duff."

In contrast to the proposed action, under implementation of Alternative 4, "[t]here would be less soil compaction, displacement and erosion overall[hellip]" Additionally, a potential decision to avoid machine piling "is a positive effect on soils as there would be less compaction and soil displacement. DEIS page 140.

Page 140 of the DEIS goes on to state that utilizing hand lines rather than dozer lines "is also a positive effect to the soil resource, since there would be 24 fewer miles of soil organic matter [harmed] and soil displacement from a machine."

The term "temporary road" is a misnomer in this DEIS. As disclosed on page 154, the Forest Service is reusing "temporary" roads that were constructed (and used) recently for the Mudflow timber sale. The NEPA analysis does not reflect that "temporary" roads in the project area are routinely and repeatedly utilized for timber sale activities such that the impacts to soils, hydrology and vegetation are significant and persistent rather than "temporary."

As disclosed on page 182 of the DEIS, "[d]isturbance to surface litter and exposure of mineral soil during [machine] piling can result in patches of dense shrub conifer seedling re-growth."

ADDITIONAL SIGNIFICANT CUMULATIVE IMPACTS

Page 171 of the DEIS indicates that there are currently 14 approved Timber Harvest Plans (THPs) on private industrial forestlands that comprise approximately half of the planning area. Collectively these THPs involve significant logging of over 12,200 acres. The DEIS does not reveal any site-specific or cumulative impacts from the combination of widespread federal and private logging activities.

Further, it appears that the federal Mountain Thin, Mudflow and Algoma timber sales are additionally impacting the project area. Simply put, there is a tremendous amount of authorized and planned logging on both public and private lands that the Forest Service has not fully disclosed or analyzed.

AQUATIC CONSERVATION STRATEGY (ACS)

Please note that the project proposes numerous activities that will inhibit the agency's ability to meet the objectives of the ACS. Deleterious proposals include, but are not limited to:

- [bull] New landing establishment in Riparian Reserves
- [bull] Dozer line construction in Riparian Reserves
- [bull] Ground based yarding in Riparian Reserves
- [bull] Heavy equipment crossings in ephemeral and intermittent channels
- [bull] Machine piling and mastication in Riparian Reserves
- [bull] Road construction and reconstruction in Riparian Reserves

As acknowledged on page 120 of the DEIS Alternative 3 has the "[g]reatest potential for negative effects to Riparian Reserves.

Please also note that page 136 of the DEIS indicates that "[l]andings in general will convert productive soil into compacted surface, in most cases landings will be considered detrimentally compacted. Compacted soil[hellip]will effect hydraulic flow, soil health and porosity."

SHELTERWOOD GROUP SELECTION AND PATHOGENS

"Selective harvesting and multiple entries in forest stands have increased root disease inoculum levels and increased compaction." -Upper Rogue River Watershed Analysis Page 19.

As the Forest Service quote above (by your colleagues in the Rogue River-Siskiyou Nationa Forest) suggests, much of the best available science indicates that logging may not help alleviate risks to adverse impacts from forest pathogens, but will rather degrade

forest health and exacerbate insect and disease problems.

According to the Rogue River Siskiyou National Forest Armillaria Root Disease is often found "where human caused disturbance is evident." Yet the Highway 89 proposed action calls for significant human caused disturbance in recovering forest stands. It is known that Annosus Root Disease "fungus can be found fruiting in scattered white fir and western hemlock stumps." Yet the proposed action calls for creating thousands more of these stumps. Rogue-Siskiyou forest planners have concluded that Annosus "infection and mortality are much greater in true fir stands that have been entered more than once in stands than in stands that have not been entered" or that have been entered only once."

Unfortunately the Highway 89 proposed action calls for logging both un-entered stands and stands that have been logged only once before. The Rogue-Siskiyou National Forest also acknowledges that Black Stain Root Disease is "associated with roadsides, skid trails, landings, with trees on compacted soils, recently cut thinning stumps and slash," all practices that are called for in the Highway 89 proposed alternative. Similarly the Forest Service has concluded that "pine engravers are associated with logging slash and windthrown material."

Hence, if the agency wishes to achieve the purpose and need for the project, it should focus on small diameter understory thinning and the reintroduction of prescribed fire. Group selection openings, logging across all diameter classes and significant canopy reduction removal are not likely to improve forest health.

SENSITIVE WILDLIFE SPECIES

Compared to the proposed action, "[a]lternative 5 has fewer potential impacts on most sensitive species due to the exclusion of treatments from riparian habitat and in suitable habitat for late-successional obligate species." Retaining, rather than logging, riparian and late-successional forests better meets the project purpose and need and the agency's

objectives vis-[grave]-vis sensitive wildlife populations. We are particularly troubled by the establishment of 41 landings in moderate to high-quality resting and denning habitat and the creation of 53 landings in suitable habitat for the Pacific fisher.

CONCLUSION

We hope that project planners will incorporate our concerns and values into the project such that the agency's ecological and social objectives are met while avoiding significant deleterious impacts to the forests, soils and riparian features of this planning area. It is possible, and desirable, to conduct forest logging and restoration activities in this project while avoiding many of the significant negative environmental impacts associated with Alternative 3. Please note our support for prescribed fire, small-diameter thinning and plantation management, all of which can be conducted without logging large trees and increasing the size of the agency's transportation system.