Data Submitted (UTC 11): 9/11/2011 11:00:00 AM
First name: Rich
Last name: Fairbanks
Organization: The Wilderness Society
Title: Regional Conservation Representative
Comments: Ms. Lisa Bousfield

Interdisciplinary Team Leader

Happy Camp Ranger District

Klamath National Forest

USDA Forest Service

63822 Hwy 96

Happy Camp, CA 96039

comments-pacificsouthwest-klamath

September 6, 2011

Subject: Scoping comments for the Crawford Vegetation Project

Dear Ms. Bousfield:

Thank you for the opportunity to comment on the proposed Crawford Vegetation Project. In the interest of efficient comment processing, our comments follow the format of your scoping document.

Proposed Action

Commercial thinning and subsequent fuel treatment on 268 acres within 31 natural stands.

The textbook definition of thinning is,

the growth of the trees that remain and to increase the total yield of useful material from the stand are termed thinning."i The scoping document proposes thinning in natural stands. We assume these stands are young enough and healthy enough to respond to thinning and that you are not cutting large, old trees.

We were unable to visit these stands due to time constraints, but observe what appear to be mature trees within the

refer you to a unit at the four way junction of 15N24, 15N19, and 15N20 and the portion of a unit west of the 15N93 road in Section 35. If you are proposing to cut old trees in these natural stands, please refer to the treatments as partial cuts rather than thinnings. We also strongly suggest you include a diameter limit in the EA or EIS.

Further, we suggest you follow principle number three for dry forest restoration treatment found on page III-34 of the Revised Recovery Plan for the Northern Spotted Owl, which states, "

and restore key structural components, including large and old trees, large snags and downed logs. Retaining these structural features will conserve habitat, legacy, seed stock, and gen

values. In addition, vegetation management to reduce moisture competition and improve the vigor of these older trees will also be necessary. An emphasis should also be placed on retaining tree species that are fire and drought tolerant in those vegeta

typically of low or mixed severity or typically dominated by predominately a surface

klamath-happy-camp@fs.fed.us

is,"Cuttings made in immature stands in order to stimulate

e by remote sensing

boundaries of thinning units. For example, we

fer ised vegetation types that exhibit fire regimes

we did

Retain

genetic

tion -fires

2

regime. However, older trees likely present before fire exclusion should also be retained, regardless of their fire tolerance."

Commercial thinning and subsequent fuel treatment on 179 acres within 18 plantation stands.

We strongly support thinning of plantations. Thinning is an opportunity to reduce rate of spread, resistance to control, and severity of wildfires if thinning is followed up with thorough treatment of surface fuels.

According to Stephens et al., most types of mechanical treatment and commercial thinning can cause soil disturbance, soil compaction, disruption of nutrient cycling, damage to residual trees, and enhancement of root pathogens.ii While we recognize that these short term effects are part of a tradeoff in which overall forest health, fire resilience, fire resistance and future wildlife habitat are the long term benefits, we urge that negative effects be mitigated where feasible.

Non-commercial, commercial treatment and fuel treatment of meadow riparian areas.

We support restoration of meadow habitat.

Non-commercial thinning and mastication on 108 acres.

We would ask you to consider some of the tradeoffs of using mastication within stands of trees. We call your attention to Busse, M, Shestak, C., Knapp, E., Hubbert, K., Fiddler, G., "Lethal Soil Heating During Burning Of Masticated Fuels: Effects Of Soil Moisture And Texture" USDA Forest Service, Pacific Southwest Research Station Redding, CA

The paper concludes that when masticated fuels burn, "Temperatures exceeded the lethal threshold only to a depth of 1-2 inches in moist soil regardless of fuel load, yet surpassed this threshold to a depth of 4-6 inches in dry soil. In addition, the temperatures in dry soil were highly responsive to increasing fuel loads, whereas moist soils only showed a slight response."

Unfortunately, a wildfire is most likely to occur in this area when soils are very dry. We have observed masticated fuels that burned around the bases of trees in the Moonlight Fire (Plumas National Forest). Large Douglas-fir and Incense cedar were killed by exposure to the masticated fuels around their root collars. The splinter-like fuels produced by the masticator head exhibit a combination of relatively low packing ratio and long residence time for smoldering combustion. This slow, hot fire kills the cambium of even large thick-barked trees.

In addition, masticators may make several passes over ground that has often been traversed by feller-bunchers and other equipment. The potential for compaction, soil displacement, and delivery of noxious weed seed all combine to put the productivity of masticated stands at risk. The possibility of creating lethal surface fuel conditions around 'leave trees' is a serious concern. We realize that mastication is cost effective, but we hope you will consider avoiding it on fine textured soils or within the drip-line of residual trees.

3

Non-commercial treatment and underburning of approximately 1,027 acres of

underburning.

We strongly support underburning of mixed conifer stands.

Purpose and Need

The Wilderness Society supports the purposes of restoring forest health and biological diversity and providing forest products. We are especially supportive of efforts to reduce surface and ladder fuels, reduce density, and provide a source of firewood for local communities. The project is relatively close to Happy Camp and far from urban airsheds. We are aware that in many communities adjacent to public lands, local firewood availability falls far short of demand. We think that making firewood available makes practical sense.

Management Direction

We appreciate that although 35% of the project area is in Inventoried Roadless Area, there are no logging or mechanical treatment activities planned for these lands.

Decision to be made

We hope that the decision maker will consider these comments as they develop their decision. In conclusion, we support the efforts of the agency to adjust stand density in managed forests and to restore fuel profiles to a less hazardous condition. We hope these comments will help you achieve those goals.