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Klamath Forest Alliance
Klamath Basin & Eastside Forest Protection Program

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February 23, 2004

Kevin Moore
Ninemile IDT Leader
Fremont-Winema National Forest
Chiloquin Ranger District
38500 Highway 97 North
Chiloquin, OR 97624

RE: Ninemile Fuels Reduction Scoping Comments

Dear Kevin,

Thank you for sending me the scoping packet, and soliciting my comments on behalf of the Klamath Forest Alliance. Although I find the limited comment opportunity available under the President's Healthy Forest Restoration Act misguided, I appreciate your interest in considering my comments as you develop the environmental analysis for this project. I urge you to choose an alternative that actually reduces the long term fire risk to Chiloquin, without sacrificing old growth species habitat, the recreation experience, or tribal values in the name of short term profit.

An Additional Alternative

On May 3, 2002, Richard Ragan, Chiloquin District Ranger, signed the Decision Notice for the Chiloquin Community Fuels Reduction Project choosing an alternative that favored tribal concerns, while rejecting an alternative similar to the recently proposed Ninemile Fuels Reduction Project. At that time, the District Ranger felt that the purpose and need of the project could be met without a commercial fuels component. Alternative 2 had these design components: small diameter pre-commercial thinning (8 inch dbh or less), mechanical brush shredding, underburning, hand piling and hand cutting.

The Chiloquin Community Fuels Reduction Project lies just to the West of the Ninemile Fuels Reduction Project, and is a continuation of the fire protection strategy for the Chiloquin area. As such, most of the fire hazard and wildlife concerns for both projects are the same as illustrated by the South of Sprague Watershed Analysis (Winema NF 1995). Therefore, with that precedent stated, the Klamath Forest Alliance asks the Forest Service to consider a new alternative similar to Alternative 2 of the Chiloquin Community Fuels Reduction Project as authorized under the section "Consideration of Alternatives" of the Healthy Forest Restoration Act 2003; and fully develop it in the planned Environmental Analysis for the Ninemile Fuels Reduction Project.

The District Ranger in his decision to select Alternative 2 of the Chiloquin Community Fuels Reduction Project found:

- Alternative 2 best addressed the mix of resource concerns identified in the area and still meet the purpose and need while addressing Tribal concerns.
- Alternative 2 met the direction provided by the Winema Land and Resource Management Plan of 1990, as amended, and the intent of the National Fire Plan to reduce fire hazards around communities at risk from wildfire.
- Alternative 2 would reduce high fuel loadings over a large area (68% of the project area), and reduce the risk of large-scale, high severity wildfire occurrence.
- Alternative 2 would reduce the potential for tree mortality from insects and disease and improve big game forage.
- Alternative 2 would increase the quality and quantity of forage by stimulating new shoot production, retaining a seed source, and provide growing space for new plants in burned areas.
- His decision to implement Alternative 2 did not involve highly uncertain, unique, or unknown risks, or establish a precedent for future action with significant effects.

CONSIDERATION OF ALTERNATIVES. --- "consideration of alternatives"

(1) IN GENERAL. ---Except as provided in subsection (d), in the environmental assessment or environmental impact statement prepared under subsection (b), the Secretary shall study, develop, and describe---

(A) the proposed agency action;

(B) the alternative of no action; and

(C) an additional action alternative, if the additional alternative---

(i) is proposed during scoping or the collaborative process under subsection (f); and

(ii) meets the purpose and need of the project, in accordance with regulations promulgated by the Council on Environmental Quality.

Project Design and Layout

According to the proposal; the primary aim of the Ninemile Fuels Reduction Project is to reduce tree stocking and natural fuel accumulations, lower the risk of loss and damage to private property in the event of a wildfire, and lower the risk of fires coming from private land and causing damage to Forest Service property. The project has been re-scoped in terms of the President's Healthy Forest Restoration Act (HR 1904), which now defines the project layout and boundaries.

Although the scoping letter is helpful in terms of explaining the need for fuels treatment, it does not fully address how the project boundaries were chosen according to the President's Healthy Forest Restoration Act. There are specific sets of criteria that must be met, for lands to be logged under the President's Healthy Forest Restoration Act. Generally, these criteria involve meeting the definition of an "at-risk community", having a "community wildfire protection plan", and qualifying as an "wildland-urban interface" area. These criteria are defined below (excerpts from Healthy Forest Restoration Act) for your convenience:

WILDLAND-URBAN INTERFACE. —The term "wildland-urban interface" means—

(A) an area within or adjacent to an at-risk community that is identified in recommendations to the Secretary in a community wildfire protection plan; or

(B) in the case of any area for which a community wildfire plan is not in effect---

(i) an area extending ½-mile from the boundary of an at-risk community;

(ii) an area within 1 ½-miles of the boundary of an at-risk community, including any land that---

(I) has a sustained steep slope that creates the potential for wildfire behavior endangering the at-risk community;

(II) has a geographic feature that aids in creating an effective fire break, such as a road or ridge top; or

(III) is in condition class 3, as documented by the Secretary in the project-specific environmental analysis; and

(iii)an area that is adjacent to an evacuation route for an at-risk community that the Secretary determines, in cooperation with the at-risk community, requires hazardous fuel reduction to provide safer evacuation from the at-risk community.

AT-RISK COMMUNITY. ---The term "at-risk community" means an area---

(A) that is comprised of---

(i) an interface community as defined in the notice entitled "Wildland Urban Interface Communities Within the Vicinity of Federal Lands That Are at High Risk From Wildfire" issued by the Secretary of Agriculture and the Secretary of the Interior in accordance with title IV of the Department of the Interior and Related Agencies Appropriations Act, 2001 (114 Stat. 1009)(66 Fed. Reg. 753, January 4, 2001); or

(ii) a group of homes and other structures with basic infrastructure and services (such as utilities and collectively maintained transportation routes) within or adjacent to Federal Land.

(B) in which conditions are conducive to a large-scale wildland fire disturbance event; and

(C) for which a significant threat to human life or property exists as a result of a wildland fire disturbance event.

COMMUNITY WILDFIRE PROTECTION PLAN. ---The term "community wildfire protection plan" means a plan for an at-risk community that---

(A) is developed within the context of the collaborative agreements and the guidance established by the Wildland Fire Leadership Council and agreed to by the applicable local government, local fire department, and State agency responsible for forest management, in consultation with interested parties and the Federal land management agencies managing land in the vicinity of the at-risk community;

(B) identifies and priorities areas for hazardous fuel reduction treatments and recommends the types and methods of treatment on Federal and non-Federal land that will protect 1 or more at-risk communities and essential infrastructure; and

(C) recommends measures to reduce structural ignitability throughout the at-risk community.

When designing project layout under the Healthy Forest Restoration Act, managers must go beyond just choosing boundaries based on the simple fact that there is a private/public land interface nearby. There must be a reason for the proposed fuels reduction activity such as protecting infrastructure (homes, barns, shops, pump houses, communication sites, etc) maintaining evacuation routes, or creating a fire break based on local topography, such as a ridgeline road. With this in mind, we ask that you consider these questions to determine your compliance with the objectives of the Healthy Forest Restoration Act.

- Where are the "at-risk communities" located compared to the project boundaries?
- Are any of these communities listed in the Secretary's notice "Wildland Urban Interface Communities Within the Vicinity of Federal Lands That Are at High Risk From Wildfire"?
- Where are the scattered homes and other structures with basic infrastructure and services located in relationship to the project boundaries?
- Have any collaborative agreements between local government, local fire departments, State agencies, the tribes and interested citizens been drawn up concerning "at-risk communities"?
- Has a Community Wildfire Protection Plan been created for "at-risk communities" to identify and prioritize areas for hazardous fuel reduction treatments, and recommend the types and methods of treatment on Federal and non-Federal

land? This includes guidance from the Wildland Fire Leadership Council and plans to reduce structural ignitability throughout the "at-risk community".
- Are there any areas that have a sustained steep slope that creates the potential for wildfire behavior endangering the "at-risk community"?
- Has the project boundary been extended to include a geographic feature that aids in creating an effective fire break, such as a road or ridge top?
- Is there an evacuation route from an "at-risk community" that requires hazardous fuels reduction to make it fire safe?

Encouraging a Fire Safe Community

Planning for inevitable fire events is a critical step in ensuring that lives and property are adequately protected, and that local communities know how to respond appropriately and efficiently. Local community fire plans should be developed that describe the factors influencing fire behavior in a specific locale and specific fire hazards, identify emergency wells and water sources, and other emergency resources, describe primary and alternate firefighter access and escape routes, and outline specific steps for each family or individual to take to best ensure their safety and well-being during emergency situations.

These community fire plans should be coordinated and developed through community organizations in cooperation with local fire departments, State, local, tribal , Forest Service and other interested parties. In addition to the development of local fire plans, local planning agencies and communities within and adjacent to National Forests should identify high-risk fire zones surrounding local communities. County and State governments should then develop and enforce regulations and ordinances that prohibit or limit the construction of new housing or other structures in these high-risk zones. These zoning or planning regulations have the potential to educate local citizens about hazardous fire conditions, protect homes and lives, and encourage more appropriate development in the wildland-urban interface zone. Restoring California's Forests: An Ecologically Based Strategy for Reducing Severe Fires, Protecting Communities, and Restoring the National Forests of California
http://www.calwild.org/resources/pubs/fire.php

Key Elements of Restoration Strategies

- *Planning and Assessment*: Identify and assess ecosystem conditions, trends, impacts, and threats; develop restoration plans and projects at multiple scales; prioritize restoration efforts to maximize effectiveness while maintaining risks; and integrate efforts with larger ecosystem management and community protection strategies.
- *Conservation*: Protect relatively intact natural areas and core refugia where restoration is largely unnecessary; and eliminate, reduce, or modify the primary causes of ecosystem degradation such as logging and road construction.

- *Restoration:* Intervene directly or indirectly to reintroduce or secure natural processes or at-risk species in places where ecosystem composition, structure, and function are degraded (e.g. tree plantations) or hindered by factors such as compacted soils, channelized streams, invasive species, or fire suppression.
- *Home Protection*: Identify and prioritize communities at risk from wildfire; plan development to minimize fire risk; create defensible spaces around homes and other structures to protect them from fire damage; and establish homeowner education and assistance programs.
- *Sustainable Communities*: Increase the capacity of communities through training and job opportunities; ensure participation of interested stakeholders in restoration programs; develop alternative uses and markets for by-products of restoration activities; establish alternative economic tools and procedures to account for non-market ecological services (e.g. clean water and air); and use appropriate contracting mechanisms.
- *Adaptive Management*: Use a systematic, interdisciplinary approach to ecosystem management that continually evolves through monitoring, evaluation, research, and feedback.

Successful restoration on public lands requires reforming federal agency funding mechanisms and contracting procedures to remove incentives for ecologically, socially, and economically damaging activities. Incentives that are inconsistent with achieving ecological integrity must be eliminated and replaced with positive economic incentives to protect and restore ecological integrity, within a framework that accounts for the costs and benefits associated with natural ecological capital such as clean air and clean water provided by healthy forests (DellaSala et al. 2002).

We recommend the following actions to facilitate the establishment and utilization of alternative contracting procedures and funding mechanisms to accomplish restoration and fuels reduction work on National Forest lands: Restoring California's Forests: An Ecologically Based Strategy for Reducing Severe Fires, Protecting Communities, and Restoring the National Forests of California
http://www.calwild.org/resources/pubs/fire.php

- *De-Link restoration contracts from timber sales*. Contracting mechanisms should be driven primarily by ecological objectives, not economic interests, Restoration by-products may have commercial value such as small diameter logs, poles, wreaths and firewood. (DellaSala et al. 2002).
- *Award contracts on a "best value" basis*: Contracts for restoration work on National Forests should be awarded on a "best value" basis, rather than "lowest bid". Best value should be defined by the desired ecological, community and workforce outcomes. (DellaSala et al. 2002).
- *Emphasize local contractors and workers, with local knowledge:* Preference for "best value" contracts on public lands should go to local crews and small businesses, underserved communities, and mobile workers with direct knowledge and experience of the ecosystem. (DellaSala et al. 2002)

Appropriate Fuels Reduction

Although it offers promise, the effectiveness of thinning to reduce fire risk and restore ecological integrity has not been well documented, particularly at large spatial scales (Henjum et al. 1994, DellaSala et al. 1995, Frost 1999, Graham et al. 1999). Some studies indicate that thinning treatments may actually increase the risk and severity of fire, by increasing surface and ladder fuels, removing larger fire resistant trees, and exposing the site to increased solar radiation and wind by opening up the canopy, thus increasing the level of flammable brush growth and drying remaining fuels (Countryman 1955, Huff et al. 1995, Van Wagtendonk 1996, Weatherspoon 1996).

In addition, even when carefully conducted, thinning can cause significant environmental impacts including the following (excerpted from Frost 1999 and DellaSala and Frost 2001): Restoring California's Forests: An Ecologically Based Strategy for Reducing Severe Fires, Protecting Communities, and Restoring the National Forests of California http://www.calwild.org/resources/pubs/fire.php

- Damage to soil integrity through increased erosion, compaction, and loss of litter layer (Harvey et al. 1994, Meurisse and Geist 1994, Poff 1996).
- Increased mortality of residual trees due to pathogens and mechanical damage to boles and roots (Hagle and Schmitz 1993, Filip 1994).
- Creation of sediment that may eventually be delivered to streams (Beschta 1978, Grant and Wolff 1991).
- Increased levels of fine fuels and near-term fire hazard (Fahnestock 1968, Weatherspoon 1996, Wilson and Dell 1971, Huff et al. 1995).
- Dependence on roads, which result in numerous adverse effects (Henjum et al. 1994, Megahan et al. 1994).
- Reduced habitat quality for sensitive species associated with cool, moist micro-sites or closed-canopy forests (FEMAT 1993, Thomas et al. 1993, Agee 1996, Sackett et al. 1996, Graham et al. 1999, Feeney et al. 2000).

To ensure that the appropriate trees are removed , only trees 12 inches in diameter or smaller should be removed, with the exception being the larger trees that have excessive crown densities and are crowded near homes and businesses. By thinning from below, and focusing on removing brush and small diameter trees, most of the flammable material will be removed from the forest. Consider the site-specific situation, as each site will present unique challenges such as south-facing dry forests with high levels of brush and hardwoods, to cool, moist north-facing areas dominated by large conifer trees.

According to the Chiloquin Community Fuels Reduction Project, "current fire hazard within the analysis area is mostly due to understory brush and stand structure, not fuel loading" (Page 27). Much of the Ninemile Fuels Reduction Project has similar type ground fuel loadings based on the proximity to the Chiloquin Project, and the data contained in the South of Sprague Watershed Analysis (1995).

Fuel treatments should focus on reducing the material most responsible for the spread of wildfire – small trees, brush, shrubs, and other fine surface and ladder fuels – while retaining larger trees and older forest structures such as snags and logs (e.g. Martin and Brakebusch 1974, Agee 1993, Agee et al. 2000, Franklin et al. 2000). The largest live and dead conifer trees within a treatment area should be retained through the use of mandatory upper-diameter limits, as well as those that provide important habitat attributes such as spike tops, asymmetrical crowns, and large dead limbs. Commercial timber sales should keep the largest trees on any given site, and as a general rule should not cut large trees over 20 inches in diameter.

Because fuel reduction is needed most near homes and communities, and because of its potential for significant adverse environmental impacts, thinning projects must target small trees and brush exclusively, and focus on the wildland-urban interface, along major roads, and on previously logged stands and other areas that have been the most altered by human activities. Restoring California's Forests: An Ecologically Based Strategy for Reducing Severe Fires, Protecting Communities, and Restoring the National Forests of California http://www.calwild.org/resources/pubs/fire.php

Key Elements of Restoration Thinning

- *Focus aggressive thinning only in the wildland-urban interface and previously logged stands*. These areas are in the greatest need of thinning to protect homes and communities, and are the least likely to suffer profound ecological disturbance.
- *Implement community defense zones*. Specifying these priority fuel reduction zones and tree size limits will help retain the most fire-resistant trees.
- *Thinning programs should include some prescribed fire*. Mechanical fuel treatments such as thinning do not replicate many of the ecological benefits associated with fire – such as pest and disease control, nutrient release and cycling, creation of wildfire habitat, and influence on seedling establishment and growth. (Agee 1993, Brennan and Hermann 1994, Chang 1996, Peters et al. 1996, DellaSala et al. 1998).
- *Thinning treatments should be site specific*. Each site presents varying conditions, from south-facing, dry forests with high levels of brush and hardwoods, to cool, moist north-facing areas dominated by large conifer trees. Treatments should be prescribed on the basis of site-specific conditions, and should vary accordingly.
- *Remove only the amount necessary to make prescribed fire safe*. Structural manipulation should consist of only that minimally needed to allow natural ecological processes (particularly low intensity fire) to function again in shaping the structure of forests.
- *Retain all large trees, live and dead*. Thinning should emphasize the removal of small, dense, young, suppressed and intermediate trees. The largest live and dead conifer trees within a treatment area should be retained.
- *Retain a healthy forest canopy*. In order to prevent excessive exposure and drying of the understory, and to maintain habitat conditions for species

associated with closed canopy forests, generally 75-90% of the existing overstory crown closure should be retained where it currently exists.

- *Retain all old-growth*. Thinning and fuels reduction activities should conserve all remaining old-growth forests and large old trees whenever they occur.
- *Retain diversity of tree species, sizes, and treatment patterns*. Thinning and fuels reduction should also retain a diversity of other tree sizes and species, and retain patches of untreated areas to accommodate natural mosaic patterns and structure.
- *No new roads*. All thinning should use existing transportation systems and landings.
- *Conserve habitat for imperiled species*. Thinning treatments should not result in the adverse modification or removal of habitat for rare, threatened, or endangered species.
- *Conserve soils*. Mechanical equipment that could cause detrimental levels of compaction, displacement, or excessive soil disturbance should be prohibited, especially from sensitive sites or steep and unstable areas where erosion and landslides can lead to loss of soil productivity and sedimentation of the aquatic system.
- *Use a mosaic of treatments (and non-treatment).* Restoration treatments should include a variety of options including; non-treatment option, non-removal of material from site option, burn only option and thinning/brush removal options.

The Forest Service's current management direction recognizes the need to address small fuels, while leaving larger-diameter material to provide for ecosystem needs. For example, the interagency National Fire Plan states that "notably, the Administration's wildland fire policy does not rely on commercial logging or new road building to reduce fire risks and can be implemented under its current forest and land management policies. The removal of large, merchantable trees from forests does not reduce fire risk and may, in fact, increase such risk. Fire ecologists note that large trees "insurance for the future – they are critical to ecosystem resilience." Targeting smaller trees and leaving both large trees and snags standing addresses the core of the fuels problem." (USDA/USDI 2000).

Similarily, the Forest Service's Cohesive Strategy states that "in most cases, any receipts associated with treatments will not be significant due to the need to reduce the disproportionately large number of small, non-merchantable trees, brush, and shrubs that dominate short interval fire-adapted ecosystems and leave standing the larger, fire-tolerant trees." (USDA Forest Service, Washington Office 2000).

Reduce Road Density

By increasing motorized access, roads can cause an increase in human-caused fire ignitions, the single largest cause of fires in national forests (USDA Forest Service 1996, 1998). Roads also greatly increase fire risk by increasing access by vehicles into wildland forest areas, increasing human-caused fire ignition, which is by far the largest

cause of wildfire. More than 90% of wildfires are ignited from operating of motorized vehicles and logging equipment, smoking, arson, campfires, and debris burning (USDA 1996, 1998). A review by the Secretaries of Agriculture and Interior found that "Fires are almost twice as likely to occur in roaded areas as they are in unroaded areas". (USDA/USDI 2000).

Reducing the pervasive impacts from roads must therefore be an integral component of any comprehensive restoration and fire management strategy for federal lands in the state. Duplicative roads and other routes not needed to access private property, recreation areas, or other important sites must be closed to vehicle use. Closed roads can always be temporarily reopened to firefighters for fire suppression efforts. Restoring California's Forests: An Ecologically Based Strategy for Reducing Severe Fires, Protecting Communities, and Restoring the National Forests of California http://www.calwild.org/resources/pubs/fire.php

We recommend the following activities to reduce road impacts:

- *Inventory all roads and their impacts using the process described in the Forest Service Roads Policy:* Complete an inventory and assessment of all existing roads in the project area, including non-system and temporary roads, to determine their ecological, economic, and social impacts.
- *Close unneeded roads*: Close and obliterate all unneeded roads based on hazards and values at risk (fish passage, stream diversion potential, etc.), and to adequately maintain and improve remaining roads, including replacement of old or undersized culverts, outsloping, and resurfacing to reduce erosion. The reduction in roads should be accomplished using an ecologically-based decision process in which roads are given priority for closure on the basis of the magnitude of their current impacts and future risk of ecological integrity.
- *Prohibit new roads*: Prohibit all construction or reconstruction of new roads for restoration or fuels reduction projects, even temporary, particularly within or adjacent to roadless areas, riparian areas, steep or unstable areas, old-growth forest, and rare and unique habitats. Building new roads is not likely to be justified either ecologically or economically.

According to the Chiloquin Community Fuels Reduction Project EA, the Winema NF was scheduled to complete a forestwide road analysis by January 2003 (Page 89). This new roads inventory information should be included in the Ninemile Fuels Reduction Project EA. Suggestions for roads that could be considered for decommissioning include the roads in Copperfield Draw and Crystal Castle Drainage.

Protect Old Growth

Active restoration should not be applied in old growth areas unless there is a high degree of scientific and stakeholder support, and there are no other means for restoring or maintaining ecological integrity (DellaSala et al. 2002). These older forest elements

are generally the most resistant to fire, play numerous important ecological roles, and are widely believed to occur now at levels far below that existing prior to western settlement (Morrison 1988, Marcot et al. 1991, Bolsinger and Waddell 1993, Beardsley and Warbington 1996, Franklin and Fites-Kaufman 1996, Franklin et al. 2000). According to the Chiloquin Community Fuels Reduction Project EA, less than 5% of the original old growth ponderosa pine remains on the forest, that is an 85% reduction over historical levels (Page 50).

OLD GROWTH STANDS.--- "old growth"

> *(2) PROJECT REQUIREMENTS. ---In carrying out a covered project, the Secretary shall fully maintain, or contribute toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health, and retaining the large trees contributing to old growth structure.*

Reducing fire risk in adjacent, lower-integrity areas may be an important complementary action needed to maintain, expand, and connect these areas of relatively high ecological integrity. See large tree retention. Similarly, containing or eliminating exotic invasive species and reducing road impacts within and adjacent to these areas will be important steps in their maintenance and protection. Thinning treatments should not result in the adverse modification or removal of habitat for rare, threatened, or endangered species.

LARGE TREE RETENTION --- "large tree retention"

> *(1) IN GENERAL. ---Except in old growth stands where the management direction is consistent with subsection (e)(2), the Secretary shall carry out a covered project in a manner that---*
>
> > *(A) focuses largely on small diameter trees, thinning, strategic fuel breaks, and prescribed fire to modify fire behavior, as measured by the projected reduction of uncharacteristically severe wildfire effects for the forest type (such as adverse soil impacts, tree mortality or other impacts); and*
> > *(B) maximizes the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands.*

Wildlife Questions

<u>Bald Eagle</u>

Bald Eagles are known to nest and forage in the Chiloquin area. Are there any individuals nesting or foraging in the project area? Have Bald Eagle Nest Site Plans been completed?

Northern Goshawk

Northern Goshawk's have been seen in the Chiloquin area. Have surveys been completed and are there any individuals nesting or foraging in the project area?

Great Grey Owl

Great Grey Owl's have been seen in the Chiloquin area. Have surveys been completed and are there any individuals nesting or foraging in the project area?

Mule Deer

What is the current forage vs cover ratio, and what is the desired forage vs cover ratio? How will the project change the forage vs cover ratio in 5, 10, & 15 years out. What are the tribal concerns about changes in mule deer habitat? What is the expected trend for the Mule Deer population 5, 10 & 15 years out?

Northern Spotted Owl

Have any surveys been done in the stand replacement fir zones, Trout Creek, or the project area to date. If present, this would be an Easternmost population which must be protected due to the lack of quality habitat in the region.

Other

How will project activities affect Management Indicator Species (MIS)? The American Marten, Whiteheaded Woodpecker and Pileated Woodpecker have been seen in the area before. KFA also claims an interest in newly discovered information for all the listed species in the Appendix of the South of Sprague Watershed Analysis including; WNF Threatened & Endangered Species, SOS Amphibians, SOS Reptiles, SOS Waterfowl, SOS Mammals, SOS Birds, and SOS Plants.

Watershed Questions

Soils

Has a soil analysis been completed for the project area, and levels of compaction and mass wasting determined for each of the units? To what extent will compaction increase if ground based logging equipment is used?

Roads Analysis

Has a road analysis been completed within the project area? The forestwide road analysis was supposed to be completed by January 2003. Are there any roads that are contributing sediment to streams which could be decommissioned or stabilized.

Sprague River

The Sprague River is listed by the State of Oregon DEQ as 303(d) for summer ph, dissolved oxygen and temperature. How will this project improve that condition?

Noxious Weeds

Has a noxious weed assessment been done for the project area?

Shortnose & Lost River Suckers

Will fuel treatments occur within proposed critical habitat?

Sediment Flow

All streams in the South of Sprague Watershed have degraded segments that are currently yielding more sediment than stable reaches would, so how will the project improve that situation? In the case of Butler Creek and Crystal Castle Springs, sediment has easy access to the main river channel. Will there be any opportunities to improve the aquatic conditions at Copperfield Draw, such as road decommissioning, riparian planting, culvert replacement or grazing exclusion /fencing? What is the current condition at Wright's Meadow and Copperfield Draw? Are there still structures out there that are causing streambed scouring and fences in disrepair that could be fixed?

Thank you for the opportunity to provide input on how this project should proceed, and I hope that you will seriously consider the ideas that I have suggested above in my comments. If you need more information or clarification of questions, please feel free to contact me.

Yours Truly,

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