

Carolyn Wisdom, District Ranger
Silver Lake Ranger District
P.O. Box 129
Silver Lake, OR 97638

Dear Ms. Wisdom,

On behalf of the John Muir Project of Earth Island Institute, I am submitting the following SUPPLEMENTAL comments on the Toolbox "Fire Recovery" project (Toolbox project):

A) In the comments that we submitted yesterday, we briefly discussed the results of the Saveland & Neuenschwander (1990) study (see #2e of our comments). That study recommended a 90% crown scorch criteria for mortality determinations in order to minimize errors. However, it should also be noted that most of the trees in that study were considerably smaller than trees over 21" dbh, and therefore would be expected to have much lower survival rates than larger trees. Saveland & Neuenschwander (1990), p. 71. The Stephens & Finney (2002) study (see #2a of our comments) found that even at 90% crown kill/scorch, ponderosa pines that were 50 centimeters in diameter (a little under 20 inches in diameter) had a 58% survival rate long-term. Stephens & Finney (2002), Fig. 1. Survival rates increased markedly with increasing diameter (Id., Fig. 1), so one could expect increasing survival rates for trees over 21" dbh (Stephens & Finney only examined trees up to 50 cm dbh, and did not include any larger trees). For this reason, you could not use a 90% crown scorch criteria either, because MOST of the larger ponderosa pines will survive this level of scorch. This is especially important since your DEIS states that over 80% of the trees proposed for logging are ponderosas.

B. In light of the above information, we recommend that you employ a "no green foliage" criteria to prevent the cutting of ponderosa pines that would otherwise live. We also recommend this based upon the fact that 95% of the ponderosa pines that experience delayed mortality (i.e., that are not immediately killed by the fire) have been found to die within two years of the fire. Stephens & Finney (2002), Table 5. A total of 82% of the trees that died did so within the first year. Id. Thus, since logging is not planned to begin until two years after the fire, any large (over 21" dbh) ponderosas that still have ANY remaining green crown in the summer of 2004 could NOT reasonably be predicted to die.

Sincerely,

Chad Hanson, Director
John Muir Project
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