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To: <comments-pacificnorthwest-fremont-silverlake@fs.fed.us>  
cc:  
Subject: Toolbox DEIS Comments

11/17/2003  
04:16 PM  
Please respond  
to "Rick Ward"

Attached are comments from the Klamath Tribes Natural Resource Department regarding the Toolbox Fire Recovery Project DEIS. Please feel free to contact myself or the Natural Resource Department if you have any questions.

Rick

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Rick Ward  
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## The Klamath Tribes Natural Resource Department

November 14, 2003

United States Department of Agriculture  
Forest Service – Pacific Northwest Region  
Fremont – Winema National Forests

RE: Toolbox Fire Recovery Project, Draft Environmental Impact Statement.

Dear Sir or Madam,

Below are comments from the Klamath Tribes Natural Resource Department regarding the Toolbox Fire Recovery Project, Draft Environmental Impact Statement. Thank you for the opportunity to comment on the proposed action.

The natural resources in the Upper Klamath Basin have been extremely important to the Klamath Tribes for thousands of years and continue to be so today. As such, the primary concerns of the Klamath Tribes Natural Resource Department are the minimization of loss of resources in the short term and maximization of long term restoration. We fully realize that stand-replacement fires in low elevation pine forests have created conditions that were rare or even nonexistent historically. With that in mind, our comments are geared toward protection and enhancement of resources, primarily terrestrial wildlife and associated habitats.

Alternative G, the preferred alternative, emphasizes treatment of natural fuels. We believe that too much emphasis is placed on fuels and salvage logging and not enough emphasis on wildlife habitat, forest recovery, and aquatic restoration. More specifically, the Klamath Tribes Natural Resource Department believes that Alt. G is insufficient to meet the needs of the Tribes for the following reasons:

- a. Alt. G leaves the least amount of optimal snag and down wood-dependent species habitat of any alternative.

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- b. Alt. G requires a site specific amendment to the Forest Plan which would allow mule deer habitat effectiveness on summer and transition range to be reduced further from levels already well below standards and guidelines.
- c. Additional fuels treatments outside of salvage units in Alt. G have the potential to further simplify an already altered landscape. While fuel loads may be higher than historical levels in the proposed treatment areas, many of the surrounding areas experienced stand-replacement fires and are, or will be, devoid of any structure, a condition that is also unlike historic forests. The current condition of the proposed treatment areas help to mitigate the effects of the stand-replacement fires in the surrounding areas and the importance of these islands for wildlife habitat has become much more important than they were pre-fire.
- d. Salvage harvest in Riparian Habitat Conservation Areas (RHCA's) in Alt. G is at an unacceptable level. The ecological value of RHCA's far outweighs the economic value of salvaged timber. The potential damage to riparian habitats is not worth 394 acres of salvage.

For the reasons listed above, the Klamath Tribes Natural Resource Department recommends either Alternative D or Alternative H over Alternative G for protection of existing wildlife and aquatic habitats in the short term and enhancement of these values in the long term.

In addition, we have some recommendations that either were not included in any alternative or are too fine scale to have been included in the DEIS:

- 1. Where current conditions allow, leave cover clumps of one acre or larger every 1,200 feet.
- 2. Use timing restrictions to protect peregrine and bald eagle nesting and fledging periods, and deer and elk fawning and calving periods.
- 3. The Wildlife section mentions that severely burned mahogany stands will be monitored for natural regeneration. While it is reasonable to expect birchleaf mountain mahogany to sprout from the root crown, 2 years should be ample time to assess this. Waiting 5 to 10 years before assessing response puts additional pressure on an already stressed deer herd if plants are not resprouting.
- 4. Planting curlleaf mountain mahogany (*Cercocarpus ledifolius*) seedlings where this species existed pre-fire and no seed source is left will benefit wildlife. This is especially important on mule deer winter and transition ranges as this mahogany species provides some of the most nutritious winter forage of any plant. Curlleaf mountain mahogany does not sprout from the root crown following fire like birchleaf mountain mahogany and may take decades to reestablish seedlings and an additional 15 or more years to produce seed locally. In addition, Dealy (1971 Habitat characteristics of the Silver Lake mule deer range. Res. Pap. PNW-125) and Hopkins (1979 Plant associations of the Fremont National Forest. R6-ECOL-79-004) list curlleaf mountain mahogany as a dominant or codominant plant species in the general vicinity of the Toolbox fires.

5. Reforestation should emphasize spacing diversity and maximization of growth to move future stands toward LOS. Plantations with evenly-spaced trees and interplantings in green stands or low-mortality stands should be avoided due to the lack of structural diversity they provide, as well as exclusion of understory vegetation. We recommend a minimum of 2 crown widths distance from green trees for any seedling plantings. In addition, clumps of seedlings can be planted in ½ to 1 acres patches in high mortality areas every 5 to 10 acres to provide future thickets to serve as big game thermal and hiding cover and to add structural diversity.
6. Additional monitoring will be extremely helpful in determining the results of the proposed action. All too often monitoring is overlooked, too simplified in its approach, or dropped due to budget constraints. With that in mind, we recommend the following additions to the monitoring program:
  - a. Snag longevity and associated variables such as DBH, fire intensity, and human activity.
  - b. Understory vegetation, particularly on mule deer winter and transition ranges. If bitterbrush response is poor within five years, planting should be considered.
  - c. Monitoring of big game winter range habitat effectiveness.

As a final note, we would like to add that we were very disappointed to see cattle already using severely burned areas during the summer of 2003. Even light grazing pressure less than one year after the fire is asking for resource damage and an open invitation to noxious weeds and soil damage, as well as limiting forage regrowth.

Thank you for the opportunity to comment and feel free to contact the Klamath Tribes' Natural Resource Department if you have any questions.