

December 16, 02

Rick Elston
Silver Lake Ranger District
PO Box 129
Silver Lake, OR 97638

Dear Rick Elston:

This is in response to your Nov 12 scoping letter regarding the proposed Toolbox Fire Recovery Project. I'm sorry this comes late. I hope you can still make use of my comments

I am not philosophically opposed to salvage of fire-burned timber. However, there are a couple of key issues that need to be addressed.

The first is snags. I want the district or forest biologists to mark the trees to be retained for snags BEFORE any other trees on site are marked for removal. The biologists should select the "leave trees" from among the largest dead trees on site. This means that if there is a 24 inch DBH tree beside a 30 inch DBH tree they will mark the 30 inch tree for retention -- NOT the 24 inch tree.

There is an excellent reason to use this criterion in selecting snags. Large trees have more heartwood than smaller trees. Therefore, they will stand for MANY years longer than smaller diameter trees. I have in my files a Forest Service research paper on this, and I would be happy to send you a copy, on request, if you'd like to see it.

Large retention trees will provide habitat for our cavity nesters for the longest possible time.

Research also shows that the White Headed woodpecker, in particular, requires nest trees (ponderosa pines) in excess of 30 inches DBH. This is

another sound reason for leaving very large snags. If your staff has any questions about this, I suggest they consult with David Marshall in Portland. He is a retired US Fish and Wildlife Service biologist -- but is still working and consulting. David is an expert birder, and the author of a literature review on the White Headed Woodpecker. He maintains close contact with Rita Dixon and other scientists who've been studying this woodpecker, and other species. His phone number is 503-244-3837.

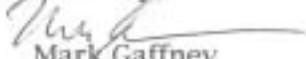
Another key issue is soil disturbance and compaction.

Please do everything possible to mitigate impacts on site. Soil compaction is a cumulative problem and I am convinced it is a very serious one. We have already compacted soils over too much ground and we need to minimize our impacts in every possible way, even if this complicates salvage efforts and adds to expense. It's worth making every effort to minimize this problem.

I have one final comment, about replanting. The proposed action statement calls for replanting of 28,000 acres. One of the problems I've noticed over the years, again and again, is the agency's tendency to overplant a site. There's no reason to plant so many trees per acre. It's a waste of taxpayer dollars, and adds extra management costs in the future. I've asked myself: who do they do it? And the only answer I have come up with is that it's a form of widget counting. Let's focus on the ground and forget about widgets!

Please keep me posted. And good luck in your important work.

Sincerely,



Mark Gaffney

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