



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

December 13, 2002

Regarding: Toolbox Fire Recovery Project Comments

Dear Carolyn,

As you have addressed in your purpose and need, time is of the essence to salvage burned dead and dying conifer (fuels), while they have merchantable value, so that you can begin the reforestation of burned areas to restore lost habitat and prevent a Toolbox II fire.

Our experience with ponderosa pine and mortality on the Summit Fire (Malheur National Forest) clearly demonstrated that those pine with less than 50% green canopy were dead within one year. I feel your selection criteria of 20% green will not remove enough of the pine that is dead or going to die that will become fuel for future fires.

It is arbitrary to limit the white fir or pine dbh to 21" maximum for removal. Fire and insects do not choose which trees to burn or infest based on diameter. For forest health and fuels reduction, decisions to remove burned or insect damaged trees should be based on existing conditions.

Please take into consideration the benefits of soil disturbance created by ground based logging. Logging, when designed correctly, can break up the hydrophobic soil layer created by the fire and minimize water runoff and erosion. This will improve the site for reforestation and future forests. Logging should not be a limiting factor in your salvage and reforestation efforts.

Thank you for the opportunity to comment. I applaud your efforts in putting together a good initial plan in a timely fashion to restore the forest.

Sincerely,

A handwritten signature in cursive script that reads 'Gerald Keck'.

Gerald Keck,
Resource Manager

