



# Oregon

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December 12, 2002

Rick Elston  
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Re: Toolbox Fire Recovery Project

Thank you for the opportunity to participate in the Toolbox Fire recovery project and for this opportunity to comment. After reviewing the scoping letter we have the following recommendations.

We assume livestock grazing within the Toolbox Fire boundary will be deferred for a minimum of two years to allow soil and vegetation recovery.

Green and burned trees less than 9" dbh and shrub habitats in addition to nutrient cycling provide bird nesting and foraging habitats. We recommend no prescribed fire be implemented within the Toolbox Fire boundary to protect remaining small diameter trees and shrub habitats.

The project planning area includes a Peregrine Falcon and two identified Bald Eagle nest sites. In addition, various species of woodpeckers including Piliated Woodpeckers utilize the planning area. Mule deer winter range exists within the planning area.

Depending upon the logging system utilized to salvage timber, operation timing and/or flight restrictions maybe needed to protect nesting peregrine falcons from disturbance.

Two Bald Eagle nests were located on Dead Indian Rim and Silver Creek at the Diversion Reservoir Dam. The Dead Indian Rim nest tree burned during the fire however replacement green trees remain in the vicinity of the nest tree. While the Silver Creek nest did not burn the fire parameter is within a half mile of the site. We recommend surveying these nest sites next spring to determine where the Bald Eagles reestablish nests. Once the nest sites are identified the BEMAs should be re-evaluated. Any salvage operations recommended should be re-evaluated for impacts to these sites. Depending upon the logging system utilized to salvage timber, operation timing and/or flight restrictions maybe needed to protect nesting bald eagles from disturbance.

The current proposal is to assess dedicated old growth stands to see if they are still functioning as old growth stands. We recommend if they are still functioning that there be no salvage. If they are not functioning and will be salvaged, we recommend replacement old growth stands be identified and dedicated. We recommend in old growth stands that will be salvaged that clumps of snags greater than 20" dbh be identified and maintained to provide Piliated Woodpecker habitat.

The current proposal uses the Forest's screens minimum recommendations for snags and down wood. We recommend snag and down log levels should reflect either what is being proposed in the Interior Columbia Basin Ecosystem Management Plan, or the DECAID model Kim Mellen with the Mt. Hood NF and others are putting together to update Thomas (1979) and Brown (1985) guidelines whichever maintains the most snags and down wood. We recommend 75% of the snags identified for retention be greater than 20" dbh with the remaining 25% between 10" to 20" dbh with 15" preferred. In addition, to provide habitat for Black-Backed Woodpeckers, we recommend 80 to 120-acre clumps of 10" to 14" dbh trees in high canopy closure stands with high to moderate burn intensity be identified and maintained. And we recommend 10 to 18-acre clumps of large ponderosa pine in low to moderate canopy closure with high to moderate burn intensity be identified and maintained for Lewis Woodpeckers. We recommend any trees that are on the ground prior to salvage operations be maintained as down wood. If this does not meet the aforementioned guidelines additional down wood should be provided.

Non-merchantable green and burned trees 9" to 14" dbh provide bird-nesting habitat, mule deer escape and fawning cover. Non-merchantable green and burned trees less than 9" dbh provide bird foraging habitat, and some cover. We recommend clumps of non-merchantable trees be identified and maintained during timber salvage and stand treatment operations to provide for wildlife habitat. In addition, we recommend no thinning occur in the remaining cover stands within the burn boundary.

In mule deer winter range we recommend 5-30 acre cover patches be identified and retained within 1200 feet of one another. Ten percent should be 30-acre patches or greater, another 15 percent should be greater than 10-acre with the remaining in 5-acre patches. These patches should be dense pockets of non-merchantable green trees where available but can be burned trees if green trees are unavailable. We recognize that burned trees may not meet the Forest's definition of cover.

Mule deer fawning and elk calving habitat occur within the burn boundary. If salvage logging is to occur in these areas we recommend cover patches be identified and retained (see recommendations above) and no activity occur May 15 through August 15 in or within a 100-ft buffer of these habitats to minimize disturbance.

We recommend that no trees be planted two crown widths from green trees greater than 20' dbh, 150 feet from aspen, willow, alder, black cottonwood and mahogany, 150

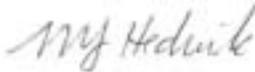
feet from cover and wildlife clumps, 150 feet from snag clumps or in or within 150-ft buffer of the woodpecker leave areas.

In order to promote the development of deciduous riparian vegetation we recommend no conifer planting within the floodplains of RHCA's. We recommend the proposed reduced stocking levels be implemented from the floodplain to the break in slope within RHCA's.

We recommend no roads be constructed or re-opened within 400 feet of sensitive wildlife habitats that include but are not limited to streamside riparian, springs, seeps, wet meadows, seasonal wetlands, natural openings, playas, lakebeds, cliffs, caves and talus slopes. Any roads identified for closure should be decommissioned or obliterated rather than closed with gates or tank traps. The road analysis after completion of project activities should consider closures or decommissioning to obtain the following open road densities. Current and proposed dedicated and replacement old growth habitat road densities should not exceed 1.5 miles of open road per square mile and should be closed to motorized use. Big game summer range should not exceed 2.5 miles of open road per square mile. And big game winter range should not exceed 1 mile of open road per square mile and should be closed to motorized use December to March.

If you have any questions or need additional information regarding any of our comments please feel free to contact me at (541) 943-3324.

Sincerely,



Mary Jo Hedrick  
Asst. District Wildlife Biologist

Cc Bob Hooton  
Craig Foster  
Amy Markus