Chetco Bar Fire Salvage Project

comments-pacificnorthwest-siskiyou-goldbeach@fs.fed.us

Jan 29, 2018

Jessie Berner, Chetco Bar Fire Salvage Coordinator
Gold Beach Ranger Station
29279 Ellensburg Ave.
Gold Beach, OR 97444

Dear Ms. Berner,

I have lived in the Brookings area since 1973, I raised my family here and worked here ever since. I have grown to know and love the woods here for most of my life. The Chetco Bar fire was devastating to the Chetco watershed we all know as one of the most pristine in the USA. I served on the Agricultural Watershed Committee for Curry County for many years as we worked to assure that farming in the area would not endanger the Chetco watershed. As I see it now, the watershed is so damaged that even if we did everything we could possibly do, it would not return to its pre fire glory in my life time. Nor would it in my children's lifetime.

Unfortunately the USFS Salvage proposal does next to nothing to attempt to restore the watershed to its previous condition. Although I totally support the USFS proposal for the little it does, I feel a much more active proposal is needed to regain the forest we once had.

When one looks at the 171,321 acres of Burned USFS lands the USFS proposed Salvage and Replanting only looks at the 13,626 acres of Matrix lands with 50% + canopy mortality. This is further reduced by eliminating IRA lands within Matrix to 11,626 acres, and then further reduced by eliminating riparian reserves to 5,580 acres. Thus the proposal is now down to only 3% of the burned area.

Matrix	25,386 acres	15 %
Matrix with 50% + canopy mortality	13,626	8%
Matrix with 50% + canopy mortality Minus Inventoried Roadless Areas	11,626	7%
Matrix with 50% + canopy mortality Minus Inventoried Roadless Areas Minus Unmapped Riparian Reserves (estimated at 52%)	5,580	3%

I think we can all learn a good lesson in reforestation by observing how South Coast Lumber has dealt with their timberlands burned by the USFS Chetco Bar Fire. South Coast began salvage harvest as soon as they could get into the area. They know that fir trees do not survive scalding and that they would have to replant stands with **less** that 50% canopy mortality. Trying to "manage" a fir tree stand with even low canopy mortality becomes a nightmare in the long term due to delayed mortality and uneven aged trees. It is better to salvage and replant these areas than leave them to delayed death and rot. The USFS proposal leaves many burned Matrix trees out of the proposal by eliminating almost ½ of the burned trees with less than 50% mortality.

These trees will most likely see heavy mortality in the years to come as they succumb to post fire ravages. The USFS proposal should at least include the matrix stands with 25-50% mortality.

BURNED LSR LAND

When I look at the Late Successional Reserve lands that were set aside for Spotted Owl Habitat I see that much of that habitat is no longer habitat, no in fact it has been incinerated in the fire. It no longer serves the purpose of the LSR designation; it no longer functions as LSR. It will not function as LSR unless it is harvested and replanted, and even then it will take a lifetime to come back to that state. If the USFS does not harvest and replant it, it will NEVER come back to that habitat state. It will instead become a desert of dead snags waiting for the next lightning strike to initiate the next fire. I ask you, is this good forest management?

Thus I believe salvage treatments and replanting should occur within Late-successional reserve (LSR) land allocation. Approximately 45,300 acres of LSR land allocation occurs within the fire perimeter with an estimated 21,700 acres burned with greater than 50% canopy mortality. Late-successional reserves in the Klamath Provinces allow additional management activities to reduce risks of large scale disturbance. Salvage guidelines are intended to prevent negative effects on late-successional habitat, while permitting some commercial wood volume removal. These guidelines are attached as well as Biscuit Fire Salvage LSR silvicultural prescription template.

	Acres	
Chetco Bar Fire	191,197	
National Forest System (NFS) lands	170,321	Percent of National Forest Lands within the fire perimeter.
Late-successional Reserve (LSR)	~ 45,300	27%
LSR with 50% + canopy mortality (48% fire average)	~ 21,744	13%
LSR with 50% + canopy mortality minus unmapped riparian reserves (estimated to be 52%)	~ 10,437	6%
Managed stands within LSR	10,799	6%
Managed stands with 50% canopy mortality (48% fire average)	5,184	3%

Past timber harvest has occurred on approximately 10,800 acres of LSR within the fire perimeter utilizing the existing road network. Salvage treatments should occur within these managed stands to recover marketable value before they become unsuitable for processing by local mills. Revenue could then be used for reforestation, road and trail maintenance, and late-successional habitat development.

BURNED IRA LAND

Further, there are quite a number of fire damaged areas within the IRA (Inventoried Roadless Areas) which are in fact not roadless. Many of these areas have existing roads that would allow the harvest and replanting of fire burned stands. The term “Inventoried Roadless Areas” is a misnomer because the classification has not much to do with the presents or absence of roads.

You may look up the definition here https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_000250.pdf at the USFS site.

" The definition of a roadless area for the 2001 Roadless Rule included: undeveloped areas typically exceeding 5,000 acres that met the minimum criteria for wilderness consideration under the Wilderness Act and that were inventoried during the Forest Service's Roadless Area Review and Evaluation (RARE II) process, subsequent assessments, or forest planning. The 1982 planning regulations and the Forest Service Handbook used the term "roadless areas" when referring to areas to consider for wilderness recommendation."

What are the limitations on management contained in the 2001 Roadless Rule?

"(1) Prohibits new road construction and reconstruction in inventoried roadless areas on National Forest System lands, **except**:
To protect health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.
Prohibits cutting, sale, and removal of timber in inventoried roadless areas**, except:**
To maintain **or restore ecosystem composition and structure**, such as reducing the risk of uncharacteristic wildfire effects.
When incidental to the accomplishment of a management activity not otherwise prohibited by this rule. "

Is it the USFS intention to burn out these once productive forests and habitats by not actively putting out the Chetco Bar Fire in July? Is it the USFS intention to turn these areas into a desert like "wilderness area" with very little habitat and no real forest growth into the future?

This USFS proposal certainly looks like a proposal that does next to nothing to restore the forest I knew to its former glory, its former pristine watershed, its former productive forest habitat. It is a proposal that leaves 97% of the burned land unrestored, unplanted, the entirety of the once pristine Chetco unprotected by reforestation.

My Comments to amend this proposal are;

(1) Consult Professional foresters to determine which stands in the Matrix with less than 50% mortality should be added to the proposal because they will not have adequate survival in the long term.
(2) Maximize Salvage and reforestation in the Matrix by including IRA land and reducing riparian set asides.
(3) Include LSR land that is no longer functioning as LSR habitat in salvage and replanting to start the restoration process.
(4) Include IRA lands that are burnt and in fact have road access via existing but un inventoried roads in salvage and replanting so that they may get included in the reforestation process.
(5) Make several salvage proposals, the one we are commenting on, one for LSR salvage and one for IRA salvage. Deal with them individually, LSR has a little more time before it is un merchantable than Matrix.
(6) Salvage and replant as much of the burned land as possible.
(7) From the start of the fire to the end, and even in the post fire area closures, the word safety was used by the 5 yard bucket load. Why is the word safety almost absent in this proposal?

Why are there no public / community safety firebreaks in this proposal? Why does this proposal have no plan to reduce standing dead snags that will spark future fires?

(8) The proposal states that many burned and un salvaged areas will grow back to Tan Oak, in fact it says Tan Oak will cover large areas of once thriving “mixed” hardwood fir forests. The proposal makes mention of the Sudden Oak Death Epidemic just upwind of these large areas that are expected to “convert” into Tan Oak. The proposal does very little to address this predicted disaster other than to mention that salvage and replanting would help to mitigate the problem. But then it only proposes to do this on 3% of the burned land. The proposal should do much more to mitigate this known, near future disaster.

(9) Transfer your personnel and funding from your proposed “Shasta Agness Landscape Restoration Project” over to a “Chetco Bar Fire Landscape Restoration Project”. We know the Shasta Agness is doing just fine sitting there unburned and healthy, while the Chetco Bar really needs Landscape Restoration in major way. It is a no brainer.

The USFS should do everything in their power to maximize salvage income so that they can do as much as possible to resurrect the forest habitat we had before the fire. The job is huge, the work is vast, it all takes money to accomplish, money that comes from salvage. I want to see this forest on the way to rehabilitation not on the path to some burned over wasteland. I know salvage logging is ugly but I also know it is the only way our once pristine watershed will ever return to what it once was. A watershed full of dieing SOD Tan Oaks is not a future I would be proud of. It would be a crime. Please do more to restore what the Chetco watershed was before the fire.

Sincerely,

Lee Riddle

96370 Wildwood Road, Brookings, OR 97415

binrydin@gmail.com

References:

USDA Forest Service 2004, Biscuit Fire Recovery Final Environmental Impact Statement, Rogue River-Siskiyou National Forest, Josephine and Curry Counties, Oregon. Volume II Appendicies

USDA Forest Service 2011, Siskiyou National Forest Management Indicator Species Forest-Wide Environmental Baseline and Species Account, page 32

NWFP ROD

Late-Successional Reserves: Late-successional reserves are to be managed to protect and enhance old-growth forest conditions. In the reserves east of the Cascades and in Oregon and California Klamath Provinces, additional management activities are allowed to reduce risks of largescale disturbance. Salvage guidelines are intended to prevent negative effects on late-successional habitat. Non-silvicultural activities within late-successional reserves are allowed where such activities are neutral or beneficial to the creation and maintenance of late-successional habitat. Thinning or other silvicultural activities must be reviewed by the Regional Ecosystem Office and the Regional Interagency Executive Committee.

NWFP – Standard and Guidelines

East of the Cascades and in the Oregon and California Klamath Provinces - Given the increased risk of fire in these areas due to lower moisture conditions and the rapid accumulation of fuels in the aftermath of insect outbreaks and drought, additional

management activities are allowed in Late-Successional Reserves. Guidelines to reduce risks of large-scale disturbance are as follows:

Guidelines to Reduce Risks of Large-Scale Disturbance - Large-scale disturbances are natural events, such as fire, that can eliminate spotted owl habitat on hundreds or thousands of acres. Certain risk management activities, if properly planned and implemented, may reduce the probability of these major stand-replacing events. There is considerable risk of such events in Late-Successional Reserves in the Washington and Oregon Eastern Cascades, and California Cascades Provinces and a lesser risk in the Oregon and California Klamath Provinces. Elevated risk levels are attributed to changes in the characteristics and distribution of the mixed-conifer forests resulting from past fire protection. These forests occur in drier environments, have had repeated insect infestations, and are susceptible to major fires. Risk reduction efforts are encouraged where they are consistent with the overall recommendations in these guidelines.

Silvicultural activities aimed at reducing risk shall focus on younger stands in Late-Successional Reserves. The objective will be to accelerate development of latesuccessional conditions while making the future stand less susceptible to natural disturbances. Salvage activities should focus on the reduction of catastrophic insect, disease, and fire threats. Treatments should be designed to provide effective fuel breaks wherever possible. However, the scale of salvage and other treatments should not generally result in degeneration of currently suitable owl habitat or other latesuccessional conditions.

In some Late-Successional Reserves in these provinces, management that goes beyond these guidelines may be considered. Levels of risk in those Late-Successional Reserves are particularly high and may require additional measures. Consequently, management activities designed to reduce risk levels are encouraged in those Late-Successional Reserves even if a portion of the activities must take place in currently late-successional habitat. While risk-reduction efforts should generally be focused on young stands, activities in older stands may be appropriate if: (1) the proposed management activities will clearly result in greater assurance of long-term maintenance of habitat, (2) the activities are clearly needed to reduce risks, and (3) the activities will not prevent the Late-Successional Reserves from playing an effective role in the objectives for which they were established.

Such activities in older stands may also be undertaken in Late-Successional Reserves in other provinces if levels of fire risk are particularly high.

Guidelines for Salvage

Salvage of dead trees is based on the following standards and guidelines, and is subject to review by the Regional Ecosystem Office. The Regional Ecosystem Office may develop criteria that would exempt some activities from review. Salvage of dead trees is not generally considered a silvicultural treatment within the context of these standards and guidelines.

Salvage is defined as the removal of trees from an area following a stand-replacing event such as those caused by wind, fires, insect infestations, volcanic eruptions, or diseases. Salvage guidelines are intended to prevent negative effects on late-successional habitat, while permitting some commercial wood volume removal. In some cases, salvage operations may actually facilitate habitat recovery. For example, excessive amounts of coarse woody debris may interfere with stand regeneration activities following some disturbances. In other cases, salvage may help reduce the risk of future stand-replacing disturbances. While priority should be given to salvage in areas where it will have a positive effect on late-successional forest habitat, salvage operations should not diminish habitat suitability now or in the future.

Tree mortality is a natural process in a forest ecosystem. Diseased and damaged trees are key structural components of late-successional forests. Accordingly, management planning for Late-Successional Reserves must acknowledge the considerable value of retaining dead and

dying trees in the forest as well as the benefits from salvage activities.

In all cases, planning for salvage should focus on long-range objectives, which are based on desired future condition of the forest. Because Late-Successional Reserves have been established to provide high quality habitat for species associated with late-successional forest conditions, management following a stand-replacing event should be designed to accelerate or not impede the development of those conditions. The rate of development of this habitat will vary among provinces and forest types and will be influenced by a complex interaction of stand-level factors that include site productivity, population dynamics of live trees and snags, and decay rates of coarse woody debris. Because there is much to learn about the development of species associated with these forests and their habitat, it seems prudent to only allow removal of conservative quantities of salvage material from Late-Successional Reserves and retain management opportunities until the process is better understood.

The following guidelines are general. Specific guidelines should be developed for each physiographic province, and possibly for different forest types within provinces.

1. The potential for benefit to species associated with late-successional forest conditions from salvage is greatest when stand-replacing events are involved. Salvage in disturbed sites of less than 10 acres is not appropriate because small forest openings are an important component of old-growth forests. In addition, salvage should occur only in stands where disturbance has reduced canopy closure to less than 40 percent, because stands with more closure are likely to provide some value for species associated with these forests.

2. Surviving trees will provide a significant residual of larger trees in the developing stand. In addition, defects caused by fire in residual trees may accelerate development of structural characteristics suitable for associated species. Also, those damaged trees that eventually die will provide additional snags. Consequently, all standing live trees should be retained, including those injured (e.g., scorched) but likely to survive. Inspection of the cambium layer can provide an indication of potential tree mortality.

3. Snags provide a variety of habitat benefits for a variety of wildlife species associated with late-successional forests. Accordingly, following stand-replacing disturbance, management should focus on retaining snags that are likely to persist until latesuccessional conditions have developed and the new stand is again producing large snags. Late-successional conditions are not associated with stands less than 80 years old.

4. Following a stand-replacing disturbance, management should retain adequate coarse woody debris quantities in the new stand so that in the future it will still contain amounts similar to naturally regenerated stands. The analysis that determines the amount of coarse woody debris to leave must account for the full period of time before the new stand begins to contribute coarse woody debris. As in the case of snags, province-level specifications must be provided for this guideline. Because coarse woody debris decay rates, forest dynamics, and site productivity undoubtedly will vary among provinces and forest types, the specifications also will vary.

Province-level plans will establish appropriate levels of coarse woody debris and decay rates to be used. Levels will be "typical" and will not require retention of all material where it is highly concentrated, or too small to contribute to coarse woody debris over the long timeframes discussed. This standard and guideline represents one item to be considered and may indeed result in no salvage following windthrow in low density stands. As for other management activities, it is expected that salvage standards and guidelines will be refined through the implementation and adaptive management processes.

5. Some salvage that does not meet the preceding guidelines will be allowed when salvage is essential to reduce the future risk of fire or insect damage to late-successional forest conditions. This circumstance is most likely to occur in the eastern Oregon Cascades, eastern Washington Cascades, and California Cascades Provinces, and somewhat less likely to occur in the Oregon Klamath and California Klamath Provinces. It is important to understand that some risk associated with fire and insects is acceptable because they are

natural forces influencing late-successional forest development. Consequently, salvage to reduce such risks should focus only on those areas where there is high risk of large-scale disturbance.

6. Removal of snags and logs may be necessary to reduce hazards to humans along roads and trails, and in or adjacent to campgrounds. Where materials must be removed from the site, as in a campground or on a road, a salvage sale is appropriate. In other areas, such as along roads, leaving material on site should be considered. Also, material will be left where available coarse woody debris is inadequate.

7. Where green trees, snags, and logs are present following disturbance, the green-tree and snag guidelines will be applied first, and completely satisfied where possible. The biomass left in snags can be credited toward the amount of coarse woody debris biomass needed to achieve management objectives.

8. These basic guidelines may not be applicable after disturbances in younger stands because remnant coarse woody debris may be relatively small. In these cases, diameter and biomass retention guidelines should be developed consistent with the intention of achieving late-successional forest conditions.

9. Logs present on the forest floor before a disturbance event provide habitat benefits that are likely to continue. It seldom will be appropriate to remove them. Where these logs are in an advanced state of decay, they will not be credited toward objectives for coarse woody debris retention developed after a disturbance event. Advanced state of decay should be defined as logs not expected to persist to the time when the new stand begins producing coarse woody debris.

10. The coarse woody debris retained should approximate the species composition of the original stand to help replicate preexisting suitable habitat conditions
.
11. Some deviation from these general guidelines may be allowed to provide reasonable access to salvage sites and feasible logging operations. Such deviation should occur on as small a portion of the area as possible, and should not result in violation of the basic intent that late-successional forest habitat or the development of such habitat in the future should not be impaired throughout the area. While exceptions to the guidelines may be allowed to provide access and operability, some salvage opportunities will undoubtedly be foregone because of access, feasibility, and safety concerns.

Biscuit Fire Recovery

BISCUIT FIRE SALVAGE - Silvicultural Prescription Template

Management Area:

This unit/stand lies within the **LATE-SUCCESSIONAL RESERVE (LSR)** land management allocation, Land and Resource Management Plan, Siskiyou Forest (1989), as amended by Northwest Forest Plan (1994).

Plant Association Super-Group (Super PAG):

Aspect:

Snags:

Down wood:

Management Goals:

Managed to protect and enhance conditions of late-successional and old-growth ecosystems, which serve as habitat for late-successional and old-growth related species, including the northern spotted owl. These reserves are designed to maintain a functional, interacting, late-successional and oldgrowth forest ecosystem successional reserves.

Project Objectives:

• Prevent negative effects on late-successional habitat, while permitting some commercial wood volume removal.
• Unsuitable lands will not be reforested
• Provide adequate amounts and distribution of large, down wood and snags to achieve habitat requirements of dependent species.
• Facilitate habitat recovery, as excessive coarse woody debris may interfere with stand

regeneration activities following large-scale stand replacement Biscuit Fire (2002).
• Assure reforestation of salvage areas, which are under-stocked with suitable conifers, as a result of the Biscuit Fire (2002). Provide for variable spacing of regeneration.
• Desired Conditions at the stand scale:
1. Late successional forest has over-stories dominated by 16-28 conifer trees>21” dbh per acre.
2. Old growth forests has over-stories dominated by 8-16 conifer trees >32” dbh per acre.
3. Establish fire resilient species and stand structure over time
4. Maintain hardwoods, especially deciduous species, as an important component of the stand.
• Reduce the risk of future stand replacement disturbance.