

November 6, 2008

Tom Quinn
Project Leader
Weaverville Ranger Station
PO Box 102
Weaverville, CA 96093

Re: Pettijohn LSR Project

Dear Mr. Quinn,

As the Klamath Siskiyou Wildlands Center (KS Wild) will not be able to attend the open-house meeting on November 12th, we are sending you these pre-scoping comments regarding the proposed Pettijohn Healthy Forest Restoration Act (HFRA) project. Thank you for considering our input early in the planning process.

In general KS Wild is supportive of efforts to carefully thin-from-below in fire suppressed forest stands as a method of ameliorating the impacts of fire suppression on fire dependent forest ecosystems. We also appreciate that the agency is proposing to follow the recommendation of the Roads Analysis Process (RAP) by decommissioning 2.3 miles of logging roads that are impacting water quality and that are difficult to economically maintain.

However, we do have three concerns regarding environmental impacts the proposed project that we hope the Forest Service will address.

Thin-From-Below Harvest Prescriptions Must Maintain Existing NSO Habitat.

Page 8 of the project notice indicates that the thinning-from-below prescription is designed to reduce stands that are currently at 70-90% canopy closure to 40-60% canopy closure. It is essential that such a prescription retain Spotted Owl Nesting Roosting and Foraging (NRF) habitat where it currently exists in the LSR land use allocation. In other words, if a forest stand currently contains 60% (or greater) canopy closure and contains NSO suitable habitat, post-project canopy closure must be maintained at 60%.

Downgrading suitable habitat in an LSR would violate the Northwest Forest Plan, the Land Resource Management Plan and the Healthy Forest Act. Please note that page 8 of the project notice indicates that 60% canopy closure would be retained in riparian reserves. Why then would this not also be desirable in late-successional reserves?

We are heartened by the photographs contained in Appendix B of the project notice in which it appears that overstory forest canopy is maintained. However, on a project that involves 1,155 acres of proposed thinning, two photographs may not illustrate current stand conditions across the project area.

Snags are a Crucial Habitat Element of Late-Successional Old-Growth Forests.

We are extremely concerned that the agency is proposing to eliminate snags in FMZ, FMZ expanded, and thinning units adjacent to FMZs within the LSR via this HFRA project.

Snags are an essential element of forest health, forest structure, and late-successional habitat. As acknowledged on page 8 of the project notice, Thomas et al (1990) and the Fish and Wildlife Service (1990) defined Spotted Owl (old-growth) habitat as including “numerous large snags.” Similarly, the Shasta-Trinity National Forest LRMP directs the agency to “protect and enhance late-successional characteristics” in LSRs. Large snags are a key late-successional characteristic. Indeed, the Healthy Forest Restoration Act also directs the agency to maintain late-successional forest characteristics. Hence snags should be retained as essential habitat elements in a Late Successional Reserve. The LRMP also encourages the agency to use prescribed fire and thinning from below, focus on younger stands, and accelerate development of late-successional characteristics in the LSR. None of these objectives will be furthered by removing large snag habitat from over 1,500 acres of the LSR.

Indeed, since the planning area is currently far below the desired level of old-growth forest condition (see project notice page 3) the agency should be creating (rather than removing) the large snag component in the LSR. If the agency insists on snag removal, such harvest should occur only in matrix lands adjacent to the LSR.

Heavy Equipment Crossing of Riparian Reserves Violate the Aquatic Conservation Strategy.

The proposal to allow skid trail crossings on up to 20% of designated stream course protection zones (project notice page 13) will directly inhibit attainment of the objectives of the Aquatic Conservation Strategy of the Northwest Forest Plan and hence violate both the Northwest Forest Plan and the Land Resource Management Plan. Please develop and implement an action alternative that does not require skid trail crossings in stream course protection zones.

Conclusion.

We appreciate the opportunity to provide early comments on this forest health proposal. We encourage the agency to reduce fuels and increase forest resiliency in this LSR in a manner that does not require the downgrading of suitable NSO habitat, the removal of snags from over 1,500 acres of wildlife habitat, and the use of skid trails across stream course protection zones. We are optimistic that the purpose and need for this project, which we strongly support, can be achieved without the environmental damage associated with those three harmful practices.

Thank you for considering our concerns.

Best regards,

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