DATE:
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TO:
Ryan P. Hanavan, Ph.D.
Ecosystem Research Group
121 Hickory Street Suite 3
Missoula, MT 59801
Phone: (406) 721-9420; Fax: (406) 543-3436

FROM:
Robert M. Sullivan, Ph.D., Staff Environmental Scientist
California Department of Fish & Game
Interior Timberland Planning
601 Locust Street, Redding CA 96001
Office Phone: 530-225-2315; Cell Phone: 530-227-7856
Fax: 530-225-3849; E-mail: rsullivan@dfg.ca.gov; https://r1.dfg.ca.gov/Portal/itp

TOPIC:
Pettijohn LSR Habitat improvement and Fuels Reduction Project

Dr. Ryan:

Thank you for the opportunity to see what the USFS is proposing for fuels reduction in Trinity County. The **Pettijohn LSR Habitat Improvement and Fuels Reduction Project** is clearly needed and in line with what the California Department of Fish and Game (DFG) has in mind for maintaining healthy forest conditions within late successional and old-growth forest communities in Northern California. Attention to this issue is very timely and we are glad that the need for maintaining and improving **Functional Wildlife Habitat** (a major issue with DFG) is also a central focus of this project.

Besides just the use of fire, use of alternative methods to accomplish fuel reduction in our region is greatly needed. Clearly, this allows: (1) greater monetary savings for the taxpayer, (2) flexibility in use of several alternative manual and mechanical methods of fuels reduction (i.e., thinning by hand, mastication, fire, etc.), (3) flexible and extended work schedules (i.e., work can be done 8 to 10 months per year rather than just when conditions are right for fire), (4) a controlled and safe environment, and (5) the opportunity to contract with local agencies and private individuals for this service, rather than relying solely on prescribed fire (requiring special climatic conditions) or use of catastrophic wildlife (worst case scenario) in attaining regional fuel reduction needs. Obviously, what would be even better is a coordinated and integrated fuels reduction policy/arrangement between Federal, State, and private sectors that would function year-round and state-wide.

I would also like to put in a word for applying the same fuel reduction needs to riparian zones (i.e. Class 1 and Class 2 streams, WLPZ, stream-courses, etc.) in this project for. Currently, the California Forest Practice Rules, review team agencies, and timber companies tend to manage riparian zones towards conifer dominated systems. As a result, riparian hardwoods such as willow, alder, cottonwood, aspen, etc., get shaded out in areas where habitat diversity would benefit aquatic and wildlife resources. Riparian hardwoods provide a multi-tiered transitional zone between land and water. Hardwoods in the riparian zone create greater diversity and increase productivity through diverse plant types. They provide a leaf litter food source to instream macro-invertebrates, which benefit salmonids (particularly coho) and amphibians, and provide different canopy elevations for various birds and mammals (not just Spotted Owls). Therefore, I would suggest that the USFS consider promoting hardwood enhancement in riparian areas where zones are or have already become conifer dominated for the purpose of maintaining healthy riparian communities and riparian hardwood plant species diversity, which would benefit both aquatic and terrestrial invertebrates and vertebrate animals as well. I hope these comments are useful for this important project.

Sincerely,

Staff Environmental Scientist, California Department of Fish and Game