

January 4, 2018

Klamath National Forest  
Attn: Lisa Bousfield  
1711 S. Market Street  
Yreka, CA 96097

Re: Seiad-Horse Risk Reduction Scoping Comments

To Whom It May Concern:

We appreciate the opportunity to submit our comments in response to the proposed Seiad-Horse Risk Reduction project in the Klamath National Forest.

The Klamath-Siskiyou region is a globally significant center of biodiversity, and the rugged Siskiyou Crest is its most important linkage with the Cascade Mountains and the Cascade-Siskiyou National Monument to the east. The proposed Seiad-Horse Risk Reduction project area lies at a critical junction between the Marble Mountain Wilderness to the south, the Red Buttes Wilderness to the north, and the Siskiyou Wilderness to the west.

Rogue Valley Audubon Society is a local organization focused on the conservation of birds, and our members often visit the Siskiyou Crest area for birding, hiking, and natural history study. We are very concerned about the potential impact of a proposed salvage logging project in this unique region. In particular, we are concerned about proposed salvage logging in 7,447 acres of Late Successional Reserve (LSR) forests.

We would like to take this opportunity to make the following points, which we hope you will consider before going forward with the proposed project.

**Unlogged snag forests are important habitat.**

Wildfires are a natural part of western ecosystems. The Siskiyou Crest region is well-adapted to wildfire, where a mix of low, moderate and high-intensity fires creates a mosaic of interconnected habitats. Salvage logging following fire is an ecologically destructive activity that removes snags and soil nutrients critical for natural recovery.

Following a wildfire, standing dead snags attract cavity nesting birds. In fact, the avian species richness may increase in burned areas following a fire. Bird species that are attracted to burned forests include woodpeckers, seedeaters, and flycatchers; some of these species may even depend on snag habitat for nesting, perching and food.

Herbaceous plants and shrubs, some of which depend on fire for seed germination, colonize burned areas following a fire. These plants support a variety of insects, which in turn attract and support an array of birds. Small mammals and ungulates such as deer also take advantage of this new habitat. In fact, burned areas support many shrub-dependent species for many years after a fire has occurred.

### **Salvage logging can compromise valuable snag habitat.**

A common argument for salvage logging following a fire is that such operations reduce the future fire hazard. However, we argue that such an argument is a poor excuse for commercial timber extraction. In reality, salvage logging may increase the wildfire hazard due to the piles of slash that are likely to be left behind. As Don Donato points out in his study on salvage logging and fire risk, “Fuel reduction treatments (prescribed burning or mechanical removal) are frequently intended, but resources to complete them are often limited.”<sup>1</sup>

Furthermore, management is not needed to ensure the Siskiyou Crest ecosystem “recovers;” to the contrary, we argue that removing large standing fire-killed snags does the opposite, by removing the very features that attract species that are adapted to this very specific habitat.

Several studies have found that cavity-nesting birds prefer nesting sites with a high density of snags—i.e., unlogged burned forests—compared to burned areas in which salvage logging has occurred. For example, one study which examined nest-site selection by cavity-nesting birds over a 10-year period found that “nest-site selection for most species was consistently associated with higher snag densities and larger snag diameters.”<sup>2</sup> Another study in the Blackfoot-Clearwater Wildlife Management Area of Montana surveyed 563 active nests of 18 species of cavity-nesting birds. All species were found nesting in the uncut burned forest plots, while less than half (eight) nested in the salvage-logged plots. In addition, “All except one species nested at a higher density in the unlogged areas, and half of the species were significantly more abundant in the unlogged plots.”<sup>3</sup>

Research has also shown that fires, even high-intensity ones, do not negatively impact the survival rates of spotted owls. However, salvage logging operations could negatively impact the spotted owl by further disrupting habitat. One California study found that spotted owls foraged heavily in “high-severity burned forests.” These areas had lots of snags and shrubby and herbaceous cover—characteristics that are thought to be associated with increased abundance or accessibility to prey. The authors of this study recommend that “burned forests within 1.5 km of nests or roosts of California spotted owls not be salvage-logged until long-term effects of fire on spotted owls and their prey are understood more fully.”<sup>4</sup>

We are also concerned about other negative impacts of salvage logging, namely the removal of seed banks and nutrients and the destabilization of soils. This in turn can result in increased erosion, which can compromise water quality in streams.

### **Artificial replanting inhibits natural recovery of ecosystems**

We are also concerned about the proposed artificial replanting proposed for hundreds of acres affected by high-intensity fires. Replanting is a questionable practice that can slow the natural recovery of forests and streams—and consequently, negatively impact the creatures that depend on them. Replanting results in lower quality habitat that consist of even-aged and homogenous stands. Such stands can also increase the likelihood of future fires.

What we have summarized here is but a small sampling of the research and literature available on the topic of salvage logging and ecosystem health. We urge you to consider these impacts and choose a natural recovery for this special and ecologically significant region. We look forward to your response, and request that Rogue Valley Audubon Society be included in all mailings related to this project proposal.

Sincerely,

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### **References:**

1. Donato D.C., J.B. Fontaine, L.L. Campbell, W.D. Robinson, J.B. Kauffman, B.E. Law. 2006. Post-Wildfire Logging Hinders Regeneration and Increases Fire Risk. *Science*: January 5, 2006.
2. Saab, Victoria A., Robin E. Russell and Jonathan G. Dudley. Nest-site selection by cavity-nesting birds in relation to postfire salvage logging. 2009. *Forest Ecology and Management* 257: 151-159.
3. Hutto, Richard L. and Susan M. Gallo. The Effects of Postfire Salvage Logging on Cavity-Nesting Birds. 2006. *The Condor*: 108(4): 817-831.
4. Bond, Monica L., Derek E. Lee, Rodney B. Sigel, and James P. Ward. Habitat Use and Selection by California Spotted Owls in a Post-fire Landscape. 2009. *Journal of Wildlife Management*: 73(7):1116–1124