

# Chetco Bar Fire Timber Salvage

## Introduction

Good morning. My name is Larry Ismert. I am a retired Registered Professional Forester and live at 95137 South Bank Pistol River Road on property that my ancestors acquired in 1889. I would like to address elements of the timber salvage program contemplated by the US Forest Service that are to be conducted on Curry County lands within the perimeter of last summer's Chetco Bar Fire. Specifically these comments apply to three distinct categories of timber salvage: salvage occurring on matrix lands, salvage occurring on late successional reserve lands and roadside salvage.

## Matrix Lands

Matrix lands are those national forest lands that permit the harvest of timber. The USFS solicited public input on January 5, 2018 for their fire salvage program for timber killed in the Chetco Bar Fire. The announced program restricted the salvage of fire killed timber to lands classified as matrix lands which had incurred 50 - 100% canopy cover loss in the fire. The area of matrix land within the fire perimeter is reported by the USFS to be 25,386 acres or about 15 % of the total. The gross acreage of matrix lands considered for salvage operations was 13,626 acres. The actual salvage area contemplated will be further reduced to account for included inventoried roadless areas, leaving non-merchantable tree species or size classes, avoiding unmapped riparian reserve areas, consideration of limitations due to limited road access, and post-fire wildlife habitat considerations. To date, the further reductions to the matrix salvage areas that have been identified are included inventoried roadless areas totaling 2,358 acres. Additional reductions for unmapped riparian reserves are estimated by the USFS to be approximately 52% of the included area. Thus, of the 170,321 acres of National Forest land within the perimeter of the fire, the area being considered for timber harvest comprises approximately 5,409 acres. Depending upon the extent of additional reductions, the final harvest as proposed will thus be confined to somewhere between 0% and 3.2% of the total National Forest land within the fire perimeter. According to the USFS, timber within this matrix area was scheduled to be harvested over the next 5 to 20 years and is largely comprised of mixed hardwood/conifer stands with high composition of tanoak.

The Siskiyou Land and Resource Management Plan (LRMP) has a stated forest wide goal that includes helping to supply local, regional and National social economic needs. The Northwest Forest Plan states that Forests covered under this plan are to maintain a sustainable supply of timber and other forest products that will help maintain the stability of local and regional economies on a predictable and long-term basis. According to the USFS, the Northwest Forest Plan also specifies that economic benefits of timber production from matrix lands receive greater consideration than found in other designated use classifications. For example, the commercial salvage of dead trees will be less constrained and replanting disturbed areas will be a high priority. The letter and intent of the Siskiyou Land and Resource Management Plan and the Northwest Forest Plan strongly suggests that maximizing the timber productivity of the matrix designated lands is a primary management objective for these lands. "The management objectives of matrix points to the need of harvesting timber; subsequently, it is important

to salvage timber and reset the timber production for future harvest opportunities. This timber would be harvested, capturing the economic value that was intended to be sustainably and evenly harvested over time.” (see page 5, January 5, 2018 Request for Comments re Chetco Bar Fire).

An underlying concern is the presence of the sudden oak death pathogen in and near many of these matrix stands. Without harvest and subsequent planting of coniferous forest components large areas could potentially convert from their present mixed hardwood /conifer stand composition to pure hardwood (largely tanoak ) stands which are confirmed to be particularly vulnerable to the sudden oak death pathogen. According to the USFS planting conifers would be an important strategy to promote diversity of tree species in these vulnerable areas.

Therefore, to be compliant with the stated goals and intent of the Siskiyou National Forest Land and Management Plan and the Northwest Forest Plan as well as to be responsive to the standards and guidelines under which matrix lands are managed, **we urge that salvage timber harvest of dead and dying trees be conducted to the maximum extent practicable on all matrix lands included within the perimeter of the Chetco Bar Fire regardless of the stated canopy cover loss.** So doing would contribute to the unified management effort to slow the spread of the sudden oak death pathogen and demonstrate that the concept of matrix lands as a resource base to support local, regional and national economies has merit and is more than a facade.

### **Late Successional Reserve Lands**

The Chetco Bar Fire burned a total of 44,527 acres of the Rogue River Siskiyou National Forest classified as Late Successional Reserve lands (LSR) according to data provided by the Forest Supervisor’s office. Late Successional Reserves are identified as areas to be managed to protect and enhance conditions of late successional and old growth forest ecosystems. They are deemed to provide habitat for late successional and old growth related species including the northern spotted owl.

There is little doubt that the fire behavior in these stands followed patterns of fire behavior exhibited elsewhere within the fire perimeter in that high severity fire effects now exist in some LSR stands with no overstory trees left alive. Such conditions are typically described as stand replacement sites. Under natural regeneration management such sites will not produce anything resembling a closed canopy late successional or old growth forest for a period variously estimated to be from 50 to over 100 years. It follows that late successional and old growth dependent species cannot reasonably be expected to occupy these sites in the near or mid-term future. The alternative to relying on the uncertainties of natural regeneration is the prompt removal of the fire killed trees and an aggressive planting program designed to reinsert tree species consistent with nearby LSR plant communities. Utilization of existing roadways would preclude new construction and permit the prompt repair of these badly damaged LSR stands.

The USFS summarized the situation on page 6 of their request for comments: “If stands are not salvaged and material proposed for removal cannot be sold, some of these stands may not be suitable for future timber production, produce suitable owl habitat, or would not be resilient to non-native pathogens such as SOD. Additionally, increased fuel loading would likely occur within untreated units.” Although this comment was aimed at removals contemplated for matrix lands, it has equal validity in reference to LSR lands. **We therefore support the salvage of Late Successional Reserve stands that have incurred moderate to high severity canopy loss and that are accessible from currently existing forest roads.**

### **Roadside Salvage**

A third category of salvage is that originating from the roadside salvage program. The roadside salvage timber is distinct and separate from any matrix and LSR considerations and is a function of the timely USFS response to ensure safety from fire killed roadside trees and debris attributable to the fire. As such, the source of this material is not linked directly to a specific use classification but is instead determined by its proximity to existing roads. **We support the prompt sale of this material to prevent volume and value loss resulting from deterioration and insect activity.**

### **Conclusion**

This concludes my comments. I urge the board to actively seek the level of salvage from the recent Chetco Bar Fire that I have just described to you. The future health of our interior Curry County forests as well as the health of our local economic base is at stake. Thank you.

Curry Wildfire Prevention

Larry Ismert, Forester