

Appendix B: Responses to Comments Received During Scoping and Significant Issues

Scoping Summary - Pilgrim Project _____

We received 11 written letters in response to the Notice of Intent, spring 2005 scoping letter and the spring 2005 ads in the Record-Searchlight and Mount Shasta Herald.

1. Michelle Berdichevsky, representing the Pit River Tribe. (recd. by FAX)
2. Michelle Berdichevsky, a separate faxed letter representing the Mount Shasta Bioregional Ecology Center (MSBEC).
3. Pete Harrison representing Californians for Alternatives to Toxics. (CATS) (Received by FAX and E-mail)
4. Kyle Haines, representing the Klamath Forest Alliance Klamath Basin and Eastside Forest Protection Program. (KFA) (Received by post office and E-mail). Denise Boggs of Wildlaw and Conservation Congress is listed as co-author, but did not sign the hard copy.
5. Scott Graecen, representing the Environmental Protection Information Center (EPIC). (Received by E-mail). George Sexton of Klamath Siskiyou Wildlands Center, and Kimberley Baker of Klamath Forest Alliance are listed as coauthors.
6. Michael Taff, a concerned citizen, supporting the project.
7. Katy Ostrowski, a concerned citizen, supporting the project.
8. Claude C. Douglas, concerned citizen and inholder, supporting the project.
9. Charles and Cleo Picard, concerned citizens, supporting the project.
10. Steve Courtney, of Sierra Pacific Industries (SPI) supporting the proposed action but recommending inclusion of all overstocked stands.
11. Joy Newcom, a concerned citizen, recommending conversion of National Forests to National Parks.

Two telephone comments were received.

1. John Kessler, representing the local Society of American Foresters, supporting the project and requesting information.
2. Steve Courtney, representing Sierra Pacific Industries, supporting the project.

Also received telephone requests for information from Stacy Stanish, of California Dept. of Fish and Game, Jim Pentrack, former representative of Klamath Forest Alliance, and George Sexton of Klamath-Siskiyou Wildlands Center.

Also received a request for information from Alex Breitler of the Record-Searchlight.

The following table summarizes comments received. Significant issues are in boldface.

Comments go through two basic screens

1. Comments identify an issue if they identify a point of disagreement, are relevant to the proposed action, and discuss effects of the proposed action.
2. Issues are significant unless they are already decided by law, regulation or higher-level decision and outside the authority of the decision-maker, or are conjectural and not supported by scientific evidence.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
1	Pit Tribe	The proposed action could affect traditional Pit River territory. Tribal consultation should be initiated.	No	No	Consultation with the Pit River Tribe has been initiated.
2	MSBEC	Both the harvesting and the reforestation in the proposed action could adversely impact the diversity of understory vegetation.	Yes	No	Site preparation for tree planting will occur only where needed, using a brush rake (versus a blade) to minimize vegetation disturbance. Trees will be hand planted to reduce soil and vegetation disturbance. Slash will only be mechanically piled in units where needed. Native grass and forb seeds will be collected for seeding disturbed areas.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
3	3 EPIC	The project could harm or extirpate native plant species, including native bunchgrass.	Yes	No	<p>Some plant species may be harmed depending on the treatment prescribed for a certain unit. Plant species are common and are in no danger of extirpation. Some treatments will improve habitat for some species by reducing canopy cover. Grass species generally increase in thinned areas, including bunch grasses. Native, perennial grass seed will be collected and used to seed skid trails and landings once the project is completed. Mitigation measures for improving diversity are listed below:</p> <ul style="list-style-type: none"> • Tree planting in many units will be hand planted to reduce soil and vegetation disturbance. • Slash will only be mechanically piled where necessary. • Native grass and forb seeds will be collected for seeding in disturbed areas. • Aspen will be released from conifer competition in one stand of about 11 acres, and six groups of less than one acre within other stands. Black oak will be released from some conifer competition. In units where it is found, oaks will be left as a favored species. • Conifers: White fir and incense cedar will generally be favored, but some will be harvested. A few suppressed and intermediate sugar pines may be harvested if there are healthier ones in the stand. Douglas fir will be retained. It will be planted in appropriate units. • Indian tobacco, grass seed, shrubs and other forbs: Tobacco seeds were gathered this season. Some seed will be grown in the greenhouse in Mt. Shasta and the rest will be scattered in areas of the project. Grass and forb seeds will be collected for seeding skid trails and landings. Shrub cuttings and/or seeds will be collected, grown and out planted where appropriate to increase species diversity and wildlife habitat. Shrubs may include but are not limited to chokecherry, serviceberry, currants, gooseberry and rose.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
4	KFA CATS	The Project could spread noxious weeds through skidding and landing construction, and reduction of canopy closure.	Yes	No	This issue is addressed in the Noxious Weed Risk Assessment prepared for this project. Mitigations for noxious weeds include: <ul style="list-style-type: none"> • Equipment washing clauses will be included in all contracts. • Old landings with known bull thistle populations will be cleared prior to plants flowering and going to seed. Bull thistle generally starts to flower in July and has gone to seed by September or October. This will reduce the spread of seed by equipment and wind dispersal. • Heavily disturbed sites such as landings and skid trails will be seeded with native grasses and forbs. • Annual monitoring of the project area will be conducted for three seasons after project completion. Monitoring and hand treatment will be done concurrently.
5	CATS	Borax could adversely impact non-target vegetation.	Yes	No	The use of Borax (Sporax is the formulation registered for forest use) is specified by FSM 3409.11 and any action alternative would include the proper timber sale C clause (C6.412) for specified use. Borax (sodium tetraborate decahydrate) is a registered pesticide (fungicide) EPA Reg. No. 2935-501, EPA Est. No. 66196-CA-1. Borax is applied to freshly cut stumps at a rate of one pound per 50 square feet of stump surface. This is equivalent to one pound of borax on 60 twelve inch stumps (Sporax, Wilbur-Ellis Label). Borax as used in forestry is identical to the material sold throughout North America as a household cleaning agent ¹ . Monitoring data has not indicated elevated levels of boron in foliage, litter or soil adjacent to the stump ² and therefore the comment is not supported by scientific evidence.
6	MSBEC KFA	Removal of trees greater than 20 inches would adversely impact habitat for the northern spotted owl, goshawk and other old-growth dependent species.	Yes	Yes	With respect to specific diameter limits for harvest, there is no such restriction in the Forest Plan. Imposing such a limit would be over restrictive and would not achieve the desired conditions by leaving many stands overstocked and preventing the removal of low vigor and dead/dying trees greater than 20 inches that are undergoing mortality from root disease and bark beetle mortality.
7	MSBEC EPIC	The proposed action could adversely affect critical habitat for the Northern Spotted Owl.	Yes	Yes	Impacts on NSO Critical Habitat will be evaluated in the BA.

¹ Dost, Frank N., et al. 1996, *Assessment of Human Health and Environmental Risks Associated with Use of Borax for Cut Stump Treatment* USDA-Forest Service. Page 1.

² Dost, Frank N., et al. 1996, *Assessment of Human Health and Environmental Risks Associated with Use of Borax for Cut Stump Treatment* USDA-Forest Service. Page 11.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
8	KFA	Thinning and/or sanitizing to less than 60% crown closure will have an adverse impact on dispersal habitat for the northern spotted owl and forage habitat for the goshawk.	Yes	Yes	<p>Thinning to 60% crown closure (approximately 200 square feet basal area/acre) is not an appropriate or sustainable density for pine stands when the stated purpose and need for the project is forest health. Research by Schmid and Mata (Research Note RM-515) and Sartwell and Stevens (Journal of Forestry 1975) have shown that stands carrying greater than 120-150 square feet of basal area/acre in the pine component are increasingly susceptible to bark beetle attacks which can indiscriminately kill individual trees and/or groups of trees irregardless of size. Bill Oliver's research using SDI (Stand Density Index) as a corresponding measure has shown that stands with SDI's greater than 230 are in the zone of imminent mortality from bark beetles. Thinning to 200 sq ft/acre corresponds to an SDI range of 294 (avg dbh of 26") to 320 (avg dbh of 18") which are also well above the 230 level threshold.</p> <p>There has been significant bark beetle mortality already in stands within the project area some of which are included in current salvage sales and these areas were thinned to 60% canopy cover, Stand 311 (33 acres/98 harvest), Stand 208 (27 acres/90 harvest) Stand 443 (11 acres/90 harvest). Maintaining stand densities at 60% canopy cover would continue this current trend of increased beetle infestation and would require more frequent subsequent entries which would add to cumulative effects and soil compaction concerns.</p>
9	KFA	Reducing crown closure below 60% will adversely impact thermal cover for game species.	Yes	No	Thermal cover is only critical on winter range for game species. This project is not on winter range.
10	KFA EPIC	Removal of trees over 20" DBH and diseased trees could adversely impact snag-dependent wildlife. (MIS snag guild)	Yes	Yes	Impacts of the project on snag-dependent species will be addressed in MIS report.
11	KFA EPIC	The proposed action could adversely impact MIS	Yes	Yes	Potentially significant with regard to the Late-successional MIS guild and the snag-dependent guild.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
12	KFA EPIC	The cumulative impact of this project and others in the McCloud and Goosenest Districts, including private land, could adversely impact habitat for sensitive, threatened and endangered species	Yes	No	Cumulative impacts to TE&S species will be addressed in the BA and BE.
13	EPIC	Cumulative effect of proposed action, barred owl competition and sudden oak death could adversely impact NSO	Yes	No	There are few, if any, oaks in the project area. Barred owls are not present.
14	EPIC	The proposed action could adversely impact the Pacific Fisher	No	No	No Pacific Fisher habitat present in the project area.
15	EPIC	Harvest and Replant regeneration areas would adversely affect late-successional species by creating fragmentation	Yes	Yes	Potential significant impacts will be addressed in the BA, BE and MIS reports.
16	KFA EPIC	Recent changes to the planning rules eliminating the MIS survey requirements may be illegal.	No	No	Not within the scope of the project.
17	KFA	The proposed action could adversely impact S&M species.	Yes	No	The project is outside the range or does not contain habitat or individuals of survey and manage species.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
18	EPIC	Regeneration and Salvage harvests will reduce coarse woody debris below the natural range of variability.	Yes	No	Mitigation measures will provide for meeting Forest Plan standards and guidelines for coarse woody debris. Historically, frequent wildland fire regulated the amount of coarse woody debris and snags. It was rare that any sizable areas would have escaped fire for more than a few decades. The frequent fires would have burned with varying severity related to topography and weather. The probable result was a landscape with many snags and logs clustered both in time and in space and very sparsely distributed in the intervening time and space ³ .
19	EPIC	Ground based logging and road construction could cause permanent damage to soil	Yes	No	<p>In thinning operations, forest canopy is retained. Organic cycling is uninterrupted and organic cover quickly recovers. Prescribed levels of coarse woody debris are retained. Soil disturbance on thinning units is caused by mechanical cutters that fall and bunch trees to create a desired spacing. The mechanical cutters have a minimal ground disturbance because they do not transport logs but merely cut and bundle. Skidder tractors carry the bundles of logs to the landings on designated skid trails. Bundled logs and designated skid trails greatly reduces the disturbed area.</p> <p>Thousands of acres have been treated similarly on the McCloud Ranger District over the past twenty years. Informal and subjective monitoring of soil compaction on other areas that have been thinned in past years on these sales shows little evidence of decrease in soil porosity or increased soil density. An exception is landings and skid trail networks where they coalesce near landings. Skid trail networks within several hundred feet of landings bear many passes with loaded skidders. Although these areas are of limited extent, they often show considerable soil compaction. Landings and skid trails within 200 feet of landings are slated for soil rehabilitation with a winged subsoiler to alleviate soil compaction, where compaction is above threshold.</p> <p>Harvest and replant units will fall well below the natural vegetative cover, and thus, reduce the normal input of organic matter for a period of time following harvest. Past experience with regeneration on these soils indicates that this does not significantly affect long-term soil productivity.</p> <p>Road construction will likely cause permanent damage to the soil but it is of such a limited extent as to be insignificant.</p>

³ Skinner 2002. *Influence of Fire on the Dynamics of Dead Woody material in Forests of California and Southwestern Oregon*. In: Laudenslayer, W.F., Shea, P.J., Valentine, B.E., Weatherspoon, C.P., and T.E. Lisle technical coordinators. Proceedings of the Symposium on the Ecology and Management of Dead Wood in Western Forests. Gen Tech. Rep. PSW-GTR-181. Albany, CA: Pacific Southwest Research Station, Forest Service, U.S> Department of Agriculture; 949 p. (p. 445-454). <http://www.fs.fed.us/psw/publications/documents/gtr-181/>.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
20	MSBEC KFA	The proposed action could cause soil compaction, thereby increasing the problems from insect attacks.	Yes	No	Adhering to Best Management Practices (BMP's) will minimize compaction and subsequent root damage. The proposed action of thinning and thinning/sanitation will promote tree health and vigor which will reduce the stand's susceptibility to bark beetle related and root disease related mortality.
21	KFA	Skidding and landing use will cause root damage.	Yes	No	Skidding and landing use will be restricted to existing skid trails and landings where possible. Adhering to Best Management Practices (BMP's) will minimize erosion, compaction and subsequent root damage.
22	CATS	Borax may not be effective against annosus disease	Yes	No	The use of Sporax on cut stumps 14 inches and larger has shown to be effective in reducing stump infection from <i>H. annosum</i> and therefore this concern is mitigated with the project design ⁴ .
23	CATS	Borax can cause health problems to applicators	Yes	No	Borax does not pose health problems to applicators as long as the safety measures on the label instructions are followed. The toxicity of borax is very low.
24	EPIC	No studies have shown that logging reduces losses from bark beetles	No	No	There is an extensive body of research that shows how thinning helps reduce the incidence of pest damage to a stand. Some examples are as follows: Cochran, P.H. and James W. Barrett. 1995. <i>Growth and mortality of ponderosa pine poles thinned to various densities in the Blue Mountains of Oregon</i> . Res.Pap. PNW-RP-483. Portland OR:U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 27 p. Fiddler, G.O., D.R. Hart, T.A. Fiddler, P.M. McDonald. 1989. <i>Thinning decreases mortality and increases growth of ponderosa pine in northeastern California</i> . USDA For. Serv. Res. Paper PSW-194. 7pp. Oliver, William W. 1995. <i>Is Self-Thinning in Ponderosa Pine Ruled by Dendroctonus Bark Beetles?</i> Pages 213-218 in Lane G. Eskew, ed. Forest Health Through Silviculture-Proceedings of the 1995 National Silviculture Workshop. USDA For. Serv. Gen. Tech. Rpt.RM-GTR-267 Sartwell, Charles and R.E. Stevens. 1975. <i>Mountain Pine Beetle in Ponderosa Pine - Prospects for silvicultural control in second growth stands</i> . J. of Forestry 73: 136-140.

⁴ Kliejunas, John; Woodruff, Bill; *Pine Stump Diameter and Sporax Treatment in Eastside Pine Stands*, June 2004, Report # R04-01; USDA Forest Service, Pacific Southwest Region, Forest Health Protection

Pilgrim Vegetation Management Project, Scoping Comments					
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25	EPIC	Thinning may increase the reproduction of Ips beetles	Yes	No	The proposed action including biomass utilization and avoiding the piling of any green slash larger than 3-4 inches in diameter from January through June will prevent the buildup of Ips beetles.
26	EPIC	Dwarf-mistletoe is a valuable species for habitat creation. The project will adversely impact dwarf-mistletoe	No	No	This comment is not relevant to the proposed action because there is relatively little dwarf mistletoe in the project area and it is not a primary target in sanitation prescriptions.
27	KFA	Thinning could increase the incidence and spread of black-stain disease by creating favorable habitat for <i>Hylastes macer</i> , a probable insect vector of this disease.	Yes	No	Thinning could increase the habitat for <i>Hylastes macer</i> . <i>Hylastes macer</i> is a "suspected vector" of black stain root disease in ponderosa pine. This has not been proven so the rest of the statement is speculation ⁵ . The black stain disease strain in the project area is specific to ponderosa pine. Most of the research quoted by the commenter is not applicable because it refers to the Douglas-fir variant, which has different insect vectors. Steremnius, for example, does not occur in this area. It is acknowledged that Otrosina and Ferrell's study is relevant. However, follow up studies done on the Devil's Garden RD by John Kliejunas of the Regional Forest Health Protection Staff shows that five years after thinning, the most extensive blackstain infections were in the unthinned control plot. This indicates that stand density is more critical than disturbance factors. Any condition that results in excessive demand for moisture such as tree crowding or any condition that reduces the ability of the roots to supply water to the tree such as root disease can cause moisture stress and increase susceptibility to attack by bark beetles. The proposed action of thinning and thinning/sanitation will promote tree health and vigor which will reduce the stand's susceptibility to bark beetle related and root disease related mortality.
28	KFA	Ground based logging and road building has created conditions favorable for root diseases. The proposed action could worsen this problem.	Yes	No	This is a generic statement about "root diseases." Only black stain root disease in ponderosa pine, annosus root disease in ponderosa pine, and annosus root disease in fir are present in the project area. Ground based logging and road building are not noted as key factors in the initiation or intensification of these diseases ⁶ .

⁵ Dave Schultz, Forest Entomologist, Personal Correspondence, April 2005

⁶ Dave Schultz, Forest Entomologist, Personal Correspondence, April 2005

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
29	KFA	Road construction can increase the incidence of black-stain disease.	Yes	No	The black stain disease strain in the project area is specific to ponderosa pine. Most of the research quoted by the commenter is not applicable because it refers to the Douglas-fir variant of the disease. "This statement would be true in Douglas-fir. There is no evidence this is true in ponderosa pine ⁷ ."
30	KFA	Logging is likely to increase the incidence of annosus root disease	Yes	No	Creation of stumps that remain untreated would increase the incidence of annosus root disease. Treatment of stumps shortly after cutting with a borate compound will prevent most infections and therefore this concern is mitigated with the project design ⁸ .
31	KFA	Seasonal restrictions are not effective in controlling the spread of annosus root disease.	No	No	Cutting during the hottest part of the year will reduce annosus root disease infections. Because there could be occasional summer showers and because there could be extensions of contracts, seasonal restrictions would not be as effective as the use of borate compounds on newly cut stumps. Seasonal restrictions in combination with the use of borate compounds on newly cut stumps would give some extra protection ⁹ .
32	CATS	Seasonal restriction should be considered as an alternative to borax in combating annosus root disease	No	No	Cutting during the hottest part of the year will reduce annosus root disease infections. Because there could be occasional summer showers and because there could be extensions of contracts, seasonal restrictions would not be as effective as the use of borate compounds on newly cut stumps. Seasonal restrictions in combination with the use of borate compounds on newly cut stumps would give some extra protection ¹⁰ .

⁷ Ibid

⁸ Ibid

⁹ Ibid

¹⁰ Dave Schultz, Forest Entomologist, Personal Correspondence, April 2005

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
33	KFA	The proposed action thinning in stands more than 50 years old would have a minimal impact in changing stand and tree growth.	Yes	No	<p>John Tappeiner's research found stand density before age 50 is the most important factor controlling tree diameter growth in both young and old-growth Douglas fir stands in coastal and western Oregon. While this research implies thinning stands before age 50 maximizes potential tree diameter growth, other research has shown that thinning increases diameter increment of older trees as well. In fact Ponderosa pine responds to release at almost any age if it has sufficient crown to take advantage of the additional growing space¹¹.</p> <p>Additional research includes the following publications relating to Ponderosa pine which is the dominant species throughout the Pilgrim project area.</p> <p>Fiddler, G.O., D.R. Hart, T.A. Fiddler, P.M. McDonald. 1989. <i>Thinning Decreases Mortality and Increases Growth of Ponderosa Pine in Northeastern California</i>. USDA For. Serv. Res. Paper PSW-194. 7pp.</p> <p>Cochran, P.H. and James W. Barrett. 1999. <i>Growth of Ponderosa Pine Thinned to Different Stocking Levels in Central Oregon: 30 Year Results</i>; Res.Pap. PNW-RP-508. Portland OR:U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 27 p.</p>
34	KFA, EPIC	Regeneration harvests are likely to increase fire intensity.	Yes	No	<p>There is no evidence to support that fire intensity would increase in the project area with the type of topography it represents. Ladder fuels will be removed which helps reduce fire intensity. Open canopy promotes growth of grass which in turn produces less BTU's when burned than the current fuel model. These areas will be monitored and fuels reduction maintenance will be applied to stands to prevent encroachment by less desirable fuel models.</p>
35	KFA	The proposed action could increase fire intensity by reducing crown closure.	Yes	No	<p>There is no evidence to support that fire intensity would increase in the project area with the type of topography it represents. Ladder fuels will be removed which helps reduce fire intensity. Open canopy promotes growth of grass which in turn produces less BTU's when burned than the current fuel model. These areas will be monitored and fuels reduction maintenance will be applied to stands to prevent encroachment by less desirable fuel models.</p>

¹¹ Barrett, James, "Silviculture of Ponderosa Pine in the Pacific Northwest: The State of Our Knowledge," December 1979, Technical Report PNW-97 p.67, Pacific Northwest Forest and Range Experiment Station, Forest Service, U.S. Department of Agriculture.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
36	MSBEC	The proposed action could adversely impact scenic values as seen from Mt. Shasta.	Yes	No	The project should not be noticed as viewed from Mt. Shasta summit (Retention VQO). The project will not be highly visible because it is approximately 10 miles from the viewer and seen through hazy atmospheric conditions. Plus, management activities are noticed less on flat topography. According to the GIS studies, the largest opening of the harvest and replant units that will be seen is approximately 35 acres. Elk Flat and other meadow restorations may appear slightly larger, but should look like natural occurrences and not be noticed.
37	CATS	Borax could spill into streams	No	No	Volcanic soil type and flat terrain will make it almost impossible for borax to enter any stream when applied according to label directions.
38	MSBEC KFA	The proposed action could adversely impact riparian areas.	Yes	No	There are very sparse amounts of riparian vegetation within riparian area on the project. Because of flat terrain and soils with low erosion hazard rating there is low probability for significant impacts to riparian areas.
39	MSBEC KFA	There is an existing problem with road density, which should be addressed in the proposed action.	Yes	No	A Roads Analysis for the project area was completed and recommend closures and decommissioning will be considered in the alternatives.
40	KFA	The recent change to the Northwest Forest Plan eliminating survey and manage may be illegal.	No	No	Outside the scope of the project.
41	EPIC	Biomass harvest may not be sustainable	No	No	Outside the scope of the project.
42	EPIC	Knobcone sanitation would result in stands managed like a woodlot. There is no need for this treatment.	Yes	No	Conversion of Knobcone to a more desirable conifer species is a standard silvicultural practice on both public and private timber lands.

Pilgrim Vegetation Management Project, Scoping Comments					
Comment #	Submitted by:	Comment	Issue?	Significant issue?	Response
43	SPI, Douglas, Ostrowski, Picard, Taff, Kessler	Supports project	No	No	Agree with support of the project.
44	Newcom	National forests should be changed into parks	No	No	Outside the scope of the project
45	SPI	Proposed Action does not treat all overstocked stands. Proposal should be expanded.	No	No	The project silviculturist looked at all stands within the project assessment area to determine those of highest priority for treatment.

Significant issues _____

The six significant issues shown in the above table have been grouped together into two issues related to late-successional habitat and snag habitat.

1. The proposed action could adversely impact critical habitat for the northern spotted owl, including dispersal habitat and forage habitat, by reducing crown closure and harvesting trees greater than 20 inches DBH, and by removing and fragmenting habitat in stands to be regenerated. These actions would also reduce habitat for the northern goshawk and other old-growth dependent species, including the late-successional group of management indicator species.

Unit: Acres dispersal and forage habitat degraded. Acres removed.

2. The proposed action could adversely impact snag-dependent management indicator species by harvesting existing snags, diseased trees and potential future snags over 20 inches DBH..

Unit: Estimated snags/acre removed, compared to remaining snags. Estimated snag recruitment.

Fall Scoping

On September 21, 2005 the public was invited to comment on a proposed Non-Significant Forest Plan Amendment specific to the Pilgrim Project wherein the 15% GTR guidelines would not be met on approximately 275 acres. Two written comments specific to this proposed amendment were received. Steven Courtney from Sierra Pacific Industries supported the plan amendment. Kyle Haines of the Klamath Forest Alliance proposed a “Natural Selection Alternative” which would require meeting the 15% GTR Guidelines and setting a 21 inch dbh cut limit. These comments were considered in developing alternatives to the proposed action.