

Department of Forestry and Fire Protection
6105 Airport Road
Redding California 96002
Resource Management Fax: 530-224-4841

February 16, 2006

RE: The following amendments to Timber Harvest Plans in Siskiyou County, California.
2-05-119-SIS (6) Amendment 1; 2-03-154-SIS (6) Amendment 9; 2-02-068-SIS (6) Amendment
10.

Please accept the following comments on the proposed logging activities in East and West Mill
Creek, Big Ferry Creek, Pat Ford Creek, Picnic Creek, and the Scott River. We will send you
more detailed comments in the near future.

We are very concerned that these Timber Harvest Plans and the associated amendments could
harm the Scott Bar Salamander (*Plethodon asupak*). This newly described (2005) species is one
of the rarest herptiles in California and likely in the United States. It has been shown to require
dense overhead canopy that the proposed logging would remove. We are extremely concerned
that the ground disturbance associated with the logging could further harm this species' habitat
and risk its long-term viability.

We also assert that this action is illegal. We request that the California Department of Forestry
refrain from authorizing these amendments as they violate the California Environmental Quality
Act, the California Endangered Species Act and would necessitate an emergency listing under
the Federal Endangered Species Act.

The CEQA applies to this case due to an effect on a rare species (CEQA Guidelines 15380), and
no categorical exemption would be available because of unusual circumstances (CEQA
Guidelines 15300.2). CEQA analysis should be performed due to significant new information
(CEQA Guidelines 15162).

We do not agree that these are "minor" plan exemptions. The CDF should revisit this decision
and allow the public to formally comment on these THPs.

Plethodon salamanders have been shown to require shade that helps maintain microclimatic
conditions conducive to the survivability of a terrestrial salamander. Microclimate at the site
level is very important to this species, and the proposed logging would change that microclimate
and harm this species.

Thank you for the chance to comment. We look forward to your response.

Regards,

Joseph Vaile
Klamath-Siskiyou Wildlands Center

Lindsey Holm
Environmental Protection Information Center