

## ELK LATE SUCCESSIONAL RESERVE ENHANCEMENT PROJECT, 2/2/16

Public input as per 1/7/16 letter from USFS from Audubon/Sierra/Klamath watch/Wild Earth membership Mt Shasta. CC Conservation Congress, EPIC California/ WE Watch/Mt Shasta Bioregional Ecology Center.

We are delighted at the prospect of releasing aspen and oak in the Elk Flat area, but questions remain. We are concerned with preservation of old growth habitat and range. We are not generally concerned with soil factors except for the washout in W½ Sec. 28.

We find the benefit to goshawks, spotted owls, marten, fisher, flammulated owl, screech owl, Cooper hawks, pileated woodpecker, and TES species is incomplete. These were recorded in previous NEPA input. Since the 1990s, these species continue to decline and NEPA and biology has thus been inadequate. We see no mention of marten or other owls, pileated woodpecker, etc. occurring in previous input.

We recorded elk, deer, and blue grouse. What will the project do to protect these species from poaching by SUV drivers? Close roads, sign them, and most important, will USFS enforce these rules? Why fence deer out of aspen/oak areas? Snow damage is rather heavy, noted in RIR 2200 form 1a. The upkeep on fences will be prohibitive; always was. This area is not deer winter range and never was, but forest diversity is always good.

Check with me and Liz Wolfe, Shasta Grotto if you find any caves in the area. We don't have any registered caves in the project area, but several in the vicinity. Some have bats. The sensitive pallid bat is a notable local user of large pine shagbark snags and is located in the flats. Townsend's big-ear bat was found in larger lava tube caves.

We also note the dead-fir mushroom *Mycena overholtsii* is present in Sec. 30. What are you doing to protect TES S&M mushroom habitat? Logging off the fir will remove it. I see the boletus is a concern, but not this one...what is the present status of this *Mycena*? Are you leaving enough big old fir logs/snags per acre for it? After burning or site prep?

We recorded about 18 goshawk nests (sec. 29-33), one spotted owl nest (which you mention), and don't mention a pileated woodpecker nest (sec. 32) in the project area. What protections/snag supply will these woodpeckers be given? We question whether the area will meet USFWS habitat requirements when finished with logging. Were past protections adequate to preserve these three species? If not, why proceed?

We have seen that since logging 1990s and 2000s that a big washout has occurred in the north center of the flat, and possibly removed a range transect. Was a creek diverted by logging or SUV ruts? Why? Who is responsible for damage? How will you correct this?

We recommend earth/dugout ponds, where intermittent streams come out of the hills. The flat itself would not hold water in a practical way due sandy soils. We prefer vandal-proof seasonal ponds rather than a pipe/guzzler project. We are delighted that the previous pipeline attempt into Elk Flat was terminated by the previous biologist.

This is in the vicinity of C2, C5, C6, and C9 historical range transects. Will these sites be preserved during logging? Why or why not? When were they read last and what were the results? What is the range condition and trend? Grazing allotment condition? Does the result justify project activity in this range type? Range will be removed by the project.

We think allotments should be cancelled if they cannot be run profitably to all taxpayers and effectively. No subsidy of permittees should be allowed. They should pay damage restoration costs if they are the result of overgrazing, regardless of who causes it.

What are KV funds and proposed projects? Generally we think all pipelines and fences should be removed or not begun due to costly upkeep and we object to subsidy.

Public grazing should be reduced if any part of the allotment is overgrazed, especially within a mile of Ash Creek. Overgrazing is mismanagement. We expect cows to concentrate on burned areas, riparian, and aspen/oak regeneration areas as usual, and this is unacceptable management. Adjust the grazing permit appropriately.

We do not recommend fencing out deer and elk, but recommend a shorter allotment season (open allotment July 1) and fewer cows for 5 years as calculated in the 1990s. We object to the previous treatment of plowing aspen/oak groves, as did the previous biologist. "Just cut off the over story of conifers and stand back," he said.

The EIS has almost no mention of cattle management or range as a cumulative or indirect effect on the project areas. We recommend closing that portion of the allotment north of Pilgrim Road for 5 years, with commensurate cattle reductions and enforcement.

The project will remove some range areas, so reduction of cows and a shortened season is desirable due to degradation. Grazing should definitely not be allowed in May under any circumstances, and open only after fawning season for deer (July 1 recommended). Cows are a fierce competitor of all ungulate game species, and degrade it for many others.

USFS always had survival trouble planting trees or grass in this poor sandy soil type. Don't tear up range to plant something unless you reduce cows for 30 years. You will create enough disturbance by the logging itself for conifer reproduction.

Sincerely, /s/

Francis Mangels  
736 Pine Ridge  
Mt Shasta, CA 96067

Ph. 530-926-0311 in PM.