May 4, 2018

Alice Carlton, Forest Supervisor
Umpqua National Forest
USDA Forest Service
Attn: Objections
2900 NW Stewart Parkway
Roseburg, OR 97471

Submitted by email to objections-pnw-umpqua@fs.fed.us

Document Title: Calapooya Divide Integrated Project

Project Description: The Forest Service issued a Draft Decision notice and Finding of No Significant Impact ("DN/FONSI") and selected Alternative 2 from the Environmental Assessment ("EA"). Alternative 2 proposes commercial logging of 695 acres of stands 67 to 162 years old in Matrix and Riparian Reserves, generating about 13.6 million board feet of timber. The proposed logging will include roughly 66% skyline logging, 30% helicopter logging, and 4% ground-based logging as well as 10 one acre helicopter landing areas. The Forest Service proposes treating activity-generated fuels on up to 489 acres within the commercial thinning areas using a combination of underburning, and hand piling and burning. Approximately 0.04 miles of existing non- system roads will be used and another 0.56 miles of roads will be created. Alternative 2 will also restore 133 acres of meadows and create an artificial ridgetop firebreak in an inventoried roadless area.

Project Location: The 9,800-acre Calapooya Divide planning area is located on the Umpqua National Forest, Cottage Grove Ranger District. The majority of the project area is within the Sharps and Brice Creek watersheds which drain into the Row River, and then into Dorena Lake, above Dorena Dam. Smaller portions reside in the upper reaches of Canton and Headwaters Steamboat watersheds which flow into the North Umpqua River above Glide Oregon. These watersheds have mixed ownership: Sharps Creek is 42% Forest Service, 21% Bureau of Land Management (BLM), and 37% private land; Brice Creek is 88% Forest Service, < 1% BLM and 11% private land; Headwaters Steamboat is 97% Forest Service, and 3 % private land and Canton Creek is 76% Forest Service, 21% BLM, and 2 % private land; The Calapooya Divide planning area is located in portions of T23S, R1E, and R2E and T24S, R1E within Lane County, OR.

Name and Title of Responsible Official:

Alice Carlton, Forest Supervisor
Umpqua National Forest

USDA Forest Service
Attn: Objections
2900 NW Stewart Parkway
Roseburg, OR 97471

Kimberly C. Briggs
District Ranger
Cottage Grove Ranger District

Lead Objector:

Reed M. Wilson
Benton Forest Coalition
203 SW 2nd ST.
Corvallis OR 97333
541-754-3254
unclereedy@hotmail.com

Request for Meeting to Discuss Resolution: Objectors hereby request a meeting to discuss potential resolution of the issues raised in this objection.

Specific Issues Related to the Proposed Action:

Benton Forest Coalition, Cascadia Wildlands, and Oregon Wild ("Objectors") respectfully submits these objections to the Calapooya Divide draft DN/FONSI, issued 3/20/2018, by the Umpqua National Forest, pursuant to 36 C.F.R. § 218. The Cottage Grove Ranger District and the responsible official, District Ranger Kimberly C. Briggs, have decided to implement Alternative 2.

1. **Interests and Participation of objecting parties.**

Benton Forest Coalition is an all-volunteer group advocating for forest conservation and enhanced recreational opportunities on public lands, representing 200 residents in and around Corvallis, Oregon. Benton Forest and its members have used and will continue to use the Calapooya project area for activities such as hiking and other recreational and professional pursuits.

Cascadia Wildlands is a non-profit corporation headquartered in Eugene, Oregon, with approximately 10,000 members and supporters throughout the United States. Cascadia Wildlands educates, agitates, and inspires a movement to protect and restore wild ecosystems in the Cascadia Bioregion, extending from Northern California up into Alaska. Cascadia Wildlands envisions vast old-growth forests, rivers full of salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia Bioregion. Cascadia Wildlands' members have used and will continue to use the Calapooya project area for activities such as hiking, bird watching, and other recreational and professional pursuits.

Oregon Wild is a non-profit corporation with approximately 20,000 members and supporters throughout the state of Oregon and the Pacific Northwest. Oregon Wild and its members are dedicated to protecting and restoring Oregon's lands, wildlife, and waters as an enduring legacy. Oregon Wild members use the forest areas comprising the Calapooya project area for hiking, recreation, wildlife watching, nature appreciation, and other recreational pursuits.

Pursuant to 36 C.F.R. § 218.5(a), these groups have submitted timely, specific written comments regarding the proposed project during a designated opportunity for the Calapooya project.

2. **Issues of the decision to which objections apply.**

As discussed in part 3, Objectors believe the Forest Service's decision, including the draft DN/FONSI violates numerous laws, regulations, and policies, including, but not limited to:

a. Failure to take the requisite "hard look" at the direct, indirect, and cumulative impacts of the project.

b. Failure to comply with the Umpqua Forest Plan amended by the Northwest Forest Plan

3. Objectors identified the following parts of the draft DN/FONSI for objection.

a. Failure to take the requisite "hard look" at the direct, indirect, and cumulative impacts of the project.

NEPA requires Forest Service disclose and analyze environmental information and the consequences of federal action. Ctr. for Biological Diversity v. Salazar, 695 F.3d 893, 916 (9th Cir. 2012) ("NEPA requires that we determine whether the agency took a 'hard look' at the likely effects of the proposed action."). Specifically, NEPA requires that the Forest Service disclose and analyze the direct, indirect, and cumulative impacts and consequences of its activities. 40 C.F.R. §§ 1502.16(a), 1502.16(b), 1508.25(c), 1508.27(b)(7). The failure to disclose and analyze requisite information indicates that the action agency failed to take a "hard look" at the environmental consequences of its actions. Klamath-Siskiyou Wildlands Ctr. v. Bur. of Land Mgmt., 387 F.3d 989 (9th Cir. 2004) (holding that requisite analysis must be in the environmental document). The purpose behind this hard look is to "insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." 40 C.F.R. § 1500.1(b).

"Taking a 'hard look' includes 'considering all foreseeable direct and indirect impacts." Ctr. for Biological Diversity v. Salazar, 695 F.3d at 916-17 (internal citation omitted) (emphasis added). Direct effects6 "are caused by the action and occur at the same time and place." 40 C.F.R. § 1508.8(a). Indirect effects "are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable ... include[ing] ... effects on air and water and other natural systems, including ecosystems." 40 C.F.R. § 1508.8(b). "To take the required 'hard look' at the proposed project's effect, an agency may not rely on incorrect assumptions or

data" in its NEPA analysis. Native Ecosystems Council v. U.S. Forest Serv., 418 F.3d 953, 964 (9th Cir. 2005).

"An EA also 'must fully assess the cumulative impacts of a project.'" Ctr. for Biological Diversity v. Salazar, 695 F.3d at 917 (internal citation omitted). Cumulative effects include "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions ... [and] can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7.

There are "two critical features of a cumulative effects analysis[:] ... [f]irst, it must not only describe related projects but also enumerate the environmental effects of those projects ... Second, it must consider the interaction of multiple activities and cannot focus exclusively on the environmental impacts of an individual project." Ore. Natural Res. Council Fund v. Brong, 492 F.3d 1120, 1133 (9th Cir. 2007). "A proper consideration of the cumulative impacts of a project requires "'some quantified or detailed information; ... [g]eneral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.'" Klamath-Sikiyou Wildlands Ctr., 387 F.3d at 993-94 (internal citation omitted). Importantly, "generalized conclusory statements that the effects are not significant or will be effectively mitigated" render a cumulative effects analysis inadequate. Id. at 996.

For the Calapooya Divide project, the Forest Service failed to take the requisite "hard look" at the direct, indirect, cumulative effects of the project.

Red Tree Voles

As in the Quartz Project, the Cottage Grove Ranger District failed to adequately survey for red tree voles before designating nest sites as non-high priority.

> Timing of "Pre-disturbance" Surveys - The attached standards and guidelines, as well as discussion in the Findings section of this Record of Decision, make clear that the requirement for pre-disturbance surveys applies to, and will be conducted before, decision notices are signed for activities. The "pre-disturbance" title too characterizes the types of activities for which these surveys are required. They are not required for all projects, all activities, or all decisions. Conversely, they may be required for activities not requiring a NEPA decision. Pre-disturbance surveys are required, as described in the attached standards and guidelines, if the planned activity is likely to have a significant negative impact on the species' habitat, its life cycle, microclimate, or life support requirements. 2001 ROD, pg. 12
>
> Aggressive thinning of fire replaced harvest units will have a "significant negative impact" on red tree vole habitat. Pre-disturbance surveys are required where triggered by protocol, "Mature forests...characterized by the onset of slowed height growth, crown expansion, heavier limbs, gaps, some mortality in larger trees, and appearance of more shade-tolerant species or additional crown layers." Survey Protocol 3.0, pg 9

Initial surveys were not conducted to protocol.

Survey Protocol 3.0 for Red Tree Voles requires the following:

> Because red tree voles tend to occur in low numbers and in a somewhat clumped distribution at the landscape and stand level scales, *survey techniques need to cover a large percentage of the survey area to ensure detection of red tree vole nests.* Vole nest trees are an indicator of a possible vole population and are used to identify the tree vole site. The actual survey methodology used will depend upon the type of project. *Either a modified line transect or individual tree examination method can be used* depending on the scale and type of project under consideration. Pg 10

Examining 12 trees, whether by ground inspection or climbing, fails to qualify as *"a large percentage of the survey area",* and fails to represent even a random sampling of the potential habitat in harvest units**.**

As in the Quartz Project, there is no indication that transect surveys were conducted within harvest units.

Transect surveyors typically leave flagging throughout harvest units in parallel lines, including flagging at the terminus of each transect. No such flagging exists in Calapooya Divide harvest units. Transect surveyors typically record GPS tracks of each transect through harvest units. Because only eight trees were initially identified for climbing, either transects were never completed, or those performing transects were completely unfamiliar with the habitat requirements of red tree voles and unqualified to perform surveys.

There is no physical evidence that the Cottage Grove Ranger District surveyed for red tree voles in harvest units. Subcontractors generally have extensive experience in climbing legacy trees, locating red tree vole nests in the canopy, and identifying potential nest trees from the ground. Transect surveyors leave parallel lines of flagging for each transect through a harvest unit, and either contractors or biologists flag potential nest trees for climbing. Benton Forest Coalition volunteers found no evidence while hiking through harvest units at the Calapooya Divide of flagging from transect surveys, flagging on trees to be climbed by subcontractors, or placards placed on trees to indicate the presence of a nest.

Also, from Red Tree Vole Survey Protocol v. 3.0:

> The main changes in this updated protocol:
>
> > 7. Recommendation to conduct tree climbing sampling in stands containing larger (> 36″ dbh) trees, if visibility into the larger trees is poor and *ground based surveys yield no vole nests*. Pg 4
>
> Individual Tree Examination (ITE) Survey Method This method is used in situations where searching individual trees in a project area would be more efficient than surveying with the modified line transect method, typically in areas where the habitat disturbing activity is fairly localized. When using this method, all potential nest trees in

the project area should be surveyed regardless of size. Pg 21

…..additional climbing should be considered to help determine the extent of the red tree vole site. In both situations, if additional sampling is conducted consider the following:

a. Climb additional (2) large trees within the stand (or portion of the stand) *within 100 m of the nest.*

b. If additional red tree vole nest trees are found during this sampling, consider additional (2) sampling *radiating out 100 m from those nest trees.*

c. Continue with this sampling approach until:

i. no more red tree vole nests are found.

ii. the search radius has taken the surveyor out of the stand where the attributes that make visibility difficult exist. In these cases, surveyors may return to a ground-based assessment (MLT or ITE surveys) for additional nest structures and not use the sampling methodology presented here. If nest structures are observed using ground-based surveys, follow the protocol methods described below under "When Potential Nest Structures are Observed During Surveys". Pg 22-23

After citizen surveys exposed the inadequacy of initial red tree vole surveys in the Quartz Integrated Project, the District contracted additional surveys in the Calapooya Divide. Additional surveys were not conducted to protocol:

1) No ground-based transect surveys identified visible nest structures or designated trees for climbing as potential nest trees.
2) Climbers were instructed to climb only two trees of a certain diameter per ten acres and disregard visible nests in smaller diameter trees, violating the survey requirement to survey potential nest trees "*of any size"*. Survey Protocol, pg 21
3) After active red tree vole nests were documented, no 100m searches were conducted, disregarding the recommendation to conduct 100m searches for potential nest trees.

The Cottage Grove Ranger District failed to recognize, or failed to acknowledge, high quality red tree vole habitat in harvest units.

"These stands, while meeting the standard of suitable habitat as described in the protocol (USDA/USDI 2012b), are composed of trees at the small end of (or even below) the suitable range and offer only a single story canopy with low structural diversity at the stand scale. There are some areas where large legacy trees provide moderate-to-high quality habitat at the site-scale, if not at the scale of the entire stand." EA, pg 126

From the NHP Site Proposal:
"The resulting thinning units are comprised of single-storied, low complexity stands. These stands are all adjacent to areas of multi-storied forest with moderate to high structural diversity which provide higher quality habitat for RTV. The proposed thinning units, while generally

suitable, comprise relatively low quality habitat In relation to the rest of the local landscape. Regardless of relative quality, these thinning stands are known to be occupied by RTVs, and as a result RTV's and their habitat will be impacted by planned thinning at the stand scale."

Professional red tree vole surveyors are experienced in identifying potential nest trees from the ground, locating nests in the canopy, and distinguishing red tree vole nests from those of other species. Red tree vole surveys are required where protocol is triggered by the presence of two legacy trees per acre (not ten acres) especially trees with brokentops, forktops, secondary reiterations, mistletoe blooms or visible cavities that provide suitable platforms for red tree vole nests. Legacies that should trigger surveys are present in many of the fire-replaced harvest units in the Calapooya Divide project. Two aged stands can provide many of the habitat requirements of spotted owls and their prey species, red tree voles and flying squirrels.

In Appendix A to the Draft Decision Notice for the Quartz Project, the Ranger District contradicted it's earlier statements about suitable red tree vole habitat, in response to comment #48 by the Benton Forest Coalition:

Comment: The UNF's failure to recognize the Quartz Project harvest units as viable red tree vole habitat violates the intention of the Northwest Forest Plan, and misrepresents the nature of habitat in the project area.

Response: The Forest Service recognized that most of the proposed Quartz harvest units were viable red tree vole habitat.

Cottage Grove Ranger District officials lack the qualification to designate non-high priority status for red tree voles.

Response: Twenty-four species, of the 346 remaining on Survey and Manage in the action alternatives, are sufficiently numerous to be placed in "uncommon" categories (as opposed to "rare") where the standards and guidelines call for Management Recommendations to describe high-priority sites for management. Sites for these species are often heavily concentrated in localized areas, but remain on Survey and Manage because of uncertainty regarding representation in nearby reserves or because of more scattered sites in other parts of their range. These are species for which, by definition, there is no need to manage "all" known sites to achieve a reasonable assurance of persistence. For these 24 species only, and only until Management Recommendations are revised to address high-priority sites, local determination (and project NEPA documentation) of non-high priority sites may be made on a case-by-case basis with: (1) guidance from the Interagency Survey and Manage Program Manager; (2) local interagency concurrence (BLM, FS, and USF&WS); (3) documented consideration of the condition of the species on other administrative units as identified by the Program Manager - typically adjacent units as well as others in the species range within the province; and, (4) identification in ISMS. The Survey and Manage Program Manager will involve appropriate taxa specialists in this determination. This coordination, and the application of this provision only to uncommon species (those with a moderate level of concern), should continue to permit

the standards and guidelines to achieve a reasonable assurance of persistence for the affected species.

The Cottage Grove Ranger District lacks the experience in red tree vole habitat recognition and surveying to qualify as "appropriate taxa specialists." NEPA regulations explain that "NEPA procedures must ensure that environmental information "must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." 40 C.F.R. § 1500.1(b). Here, the NHP proposal is lacking expertise and provides inaccurate scientific analysis.

Roadless Areas

We urged the FS to defer building and logging in native stands in unroaded area to let the natural process do the ecological work. We commented that "The NEPA analysis should reflect the growing scientific evidence indicating the significant value of roadless areas smaller than 5,000 acres and larger than 1,000 acres." This project area has numerous uninventoried roadless areas that are larger than 1,000 acres. As shown in the scientific literature we previously provided, the presence of unroaded areas greater than 1,000 acres is a relevant environemental factor which NEPA requires the FS to disclose. The FS ignored our comments and continues to withhold an analysis of this significantly relevant environmental factor.

Forest Stands

Two aged stands provide viable habitat for species dependent on older forest.

Comment #51, Quartz Integrated Project, Benton Forest Coalition:
Two aged stands with interspersed legacies can perform the same ecological function as pure old growth.
Response: Even though some stands proposed for thinning contain scattered older legacy trees, it is not a reasonable conclusion that they are ecologically functional as pure old growth. These stands lack structural layering, lack an abundance of large snags and down wood, and have simplified structural diversity. This results in a reduction in old growth dependent species, increase predation, and increase competition for resources from mid and transitional forest seral species.

The Calapooya Divide EA presents the impression that a major component of conifers and a minor component of hardwoods is an undesirable state. This is incorrect. Fire replaced harvest units in the Calapooya Divide are native stands of forests, representations of the natural range of variability, and offer excellent habitat for forest dwelling species, especially species sensitive to fragmentation caused by commercial logging - Northern Spotted Owls, red tree voles and flying squirrels.

James Swingle (Daily Activity Patterns, Survival and Movements of Red Tree Voles, Master's

Thesis, 2005) states :

"Young stands with open canopies and tall, straight trunks are probably much more inhospitable to dispersing tree voles than are young stands with dense canopies and high concentrations of trees with structures that provide substrates for temporary or permanent nests."

Northern Spotted Owl

While the barred owl continues to be a threat, conservation of existing habitat for both spotted owls and their prey can do much to help Spotted Owl populations recover. From Population Demography of the Northern Spotted Owl (Forsman et al, 2011):

> The fact that Barred Owls are increasing and becoming an escalating threat to the persistence of Spotted Owls does not diminish the importance of habitat conservation for Spotted Owls and their prey. In fact, the existence of a new and potential competitor like the Barred Owl makes the protection of habitat even more important, since any loss of habitat will likely increase competitive pressure and result in further reductions in Spotted Owl populations(Horn and MacArthur 1972, Olson et al 2004, Carrete et al, 2005) pg. 76.....there is considerable evidence that vital rates and population size of northern owls are strongly influenced by prey abundance (Korpimaki 1992, Rohner 1996, Hakkarainen et al. 1997), pg. 76.....we believe that a more inclusive definition of high-quality habitat is needed than the rather vague definition provided in the 2008 recovery plan. Much of the habitat occupied by Northern Spotted Owls and their prey does not fit the classical definition of "old growth" as defined by Franklin and Spies (1991) and a narrow definition of habitat based on the Franklin and Spies criteria would exclude many areas currently occupied by Northern Spotted Owls. Pg 77

The cumulative effects analysis is not cumulative.

The District limits the scale of analysis both spatially and temporally. A true cumulative effects analysis for spotted owls and red tree voles is not limited to one watershed and the immediate future, but extends across the range of species, and includes past and future impacts.

The District briefly admits that commercial logging has reduced habitat for imperiled species, and then goes into a lengthy effort to introduce doubt into the equation. Qualifiers - *may affect, potentially contribute, highly likely, reasonable assurance, expected to benefit indirectly, relatively small impact, not expected to have a meaningful adverse effect, may degrade, reasonably foreseeable, similarly minor, not expected to compromise, designed in part to alleviate, indirectly affect, minor changes in availability, in the short term,* and many others occur more than 40 times in the red tree vole and spotted owl analyses alone, and are intended to inject uncertainty into the conclusion that commercial logging in native forest habitat is leading to the extinction of the owl, the vole, and other Survey and Manage species. This non-analysis is a deliberate attempt to mislead the public and a violation of NEPA. Spotted owl populations continue to decline by nearly 4% per year in ten out of eleven study areas and the average size of a block of red tree vole habitat is just 2% of what it was one hundred years ago, the direct results of commercial logging on public lands. Managers at the Umpqua National Forest know this, yet insist that commercial logging projects in native forest are beneficial for imperiled species, and will continue to do so until

spotted owls and other forest dependent species are rendered extinct.

Consultation with Fish and Wildlife does not guarantee the avoidance of harm.
The term "take" is defined as " to harass, harm, etc.". Interfering with a nesting owl's ability to effectively raise hatchlings, the ability of adults to forage and feed offspring, and the ability of juveniles to disperse into new and viable habitat, constitutes harm. Virtually any logging project within a core area or home range will not only impact these processes, but also disrupt habitat for available prey species, and impair the recovery of the Owl.

b. Failure to comply with the Umpqua Forest Plan amended by the Northwest Forest Plan

The National Forest Management Act requires the Forest Service to develop comprehensive land and resource management plans (LRMPs) for each unit of the National Forest System to guide management of those lands. 16 U.S.C. § 1604(a). Subsequent "plans, permits, contracts, and other instruments for the use and occupancy" of the national forests must be consistent with the local LRMP, in this case, the Ochoco National Forest Land and Resource Management Plan ("Forest Plan"). 16 U.S.C. § 1604(i); see also *Sierra Forest Legacy v. Sherman,* 646 F.3d 1161, 1188 (9th Cir. 2011) (site-specific projects must be consistent with Forest Plan). As such, failure to comply with a forest plan provision violates NFMA. *Native Ecosystems Council v. U.S. Forest Serv.*, 418 F.3d 953, 961 (9th Cir. 2005) ("It is well-settled that the Forest Service's failure to comply with the provisions of a Forest Plan is a violation of NFMA.").

The red tree vole is protected under the Umpqua Forest Plan, amended by the Northwest Forest Plan. Accordingly, the Forest Service's management recommendations restrict logging near nest sites. If red tree vole nests are found in a forest stand, the BLM must establish a minimum 10-acre Habitat Area around active nests "to provide for the protection of the physical integrity of the nest(s) and retain adequate habitat for expansion in the number of active nests at the site." Within these Habitat Areas, any management that occurs "should not remove or modify nest trees, the canopy structure of the stand, or remove any of the dominant, codominant, or intermediate (Daniel et al. 1979) crowns. This includes activities that that may isolate nest trees or alter the microclimate within the stand." Here, the Forest Service proposes to use an exception to the management recommendations. However, to use this non-high priority exception, the Forest Service must meet the required four criteria. The Calapooya project non-high priority proposal fails to comply with the four criteria, and thus, it violates the Umpqua and Northwest Forest Plan.

The Red Tree Vole Non-High Priority Site Designation for the Calapooya Divide Integrated Project is unsupported by data.

The NHP designation fails to meet the first requirement for NHP status:

1. *Moderate-to-high number of likely extant sites/records.*

The NHP Site Proposal makes the assumption, unsupported by data from surveys, that there are a moderate-to-high number of extant sites in stands adjacent to harvest units. This is

contradicted by the Survey Protocol:

> Recent survey data supports the concern that surveys to date have resulted in many cases of occupancy being based on nests of unknown status, which overestimates the red tree vole'sc abundance. Furthermore, many of the newly identified sites are in low quality habitat, and may not provide for species' persistence in the Matrix. During surveys conducted in 1997 a total of 443 individual red tree vole nests were found within 117 sites. Eighty-four (19%) of the nests were confirmed active red tree vole nests and the remaining 359 nests (81%) were either confirmed as inactive or their activity status was not determined. At 71 (61%) of the sites, no active tree vole nests were confirmed. Single active red tree vole nests were located at 14 sites (12%) and 32 sites (27%) contained one or more active nests. This species is hard to locate, generally occurring in small clumped populations, and with a patchy distribution on the landscape (Carey 1991). Generally, when a tree vole nest is located, additional tree vole nests should be in the same stand or general area. pg 6

The assumption that there are a high number of extant sites is also unsupported by existing records. From the NHP Site Proposal:

> To date, relatively little of the federal lands in the Row River Watershed have been surveyed for RTV; Approximately 8,364 acres have been surveyed according to NRIS and GeoBOB records which accounts for only 8% of the total federal ownership (106,947 acres approx.). Approximately 4,892 acres of this survey effort (58% of the total effort) took place in areas which were previously regeneration-harvested. pg 7

From Consideration of Comments, Appendix A:
Comment: Red tree vole surveys were not conducted to protocol. As in the Quartz Project, red tree vole surveys for the Calapooya Divide were spotty and inadequate. Surveyors were directed to climb two trees per harvest unit. Two trees is an insufficient sample size to determine population density, and to extrapolate densities in adjacent stands from that small of a sample size is entirely speculative. #2
Response: Red tree vole surveys were conducted to protocol. All areas with proposed activities which triggered protocol surveys received both ground transect and tree climbing surveys (following the Additional Guidelines for Stands with Large Trees contained in the survey protocol). Climbers were instructed to climb two trees for every ten acres within each treatment area triggering protocol surveys. Additional trees were climbed around each tree discovered with red tree vole nests to discover the extent of vole sites. Survey and Manage does not require determination of population density. Survey and Manage requirements for Category C species are to survey for the species according to survey protocol, and to manage high priority sites. For more information on the survey methodology used, refer to the Survey Protocol for the Red Tree Vole ver 3.0.

Survey and Manage may not require determination of population density, but designation of non-high priority is based on estimates of population density, specifically in "adjacent stands".

The NHP Site Proposal fails to meet condition 4:

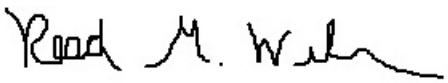
4. *Matrix S&G and other elements of the NWFP provide a reasonable assurance of persistence.*

The NHP Site Proposal cites the Reserve System for the Northern Spotted Owl. Spotted owls and red tree voles are often linked: they have similar habitat requirements, and Eric Forsman estimates that red tree voles comprise 13% of spotted owl diets in the Western Cascades, and that a mating pair of owls with two fledglings will consume an average of 57 tree voles per year. Yet spotted owl populations continue to decline precipitously in all 11 study areas, averaging nearly 4% per year, so the assumption that reserves for the owl will guarantee the maintenance of isolated populations of red tree voles is not warranted. Agencies blame the decline of spotted owls on the invasion of the barred owl rather than habitat loss to rationalize commercial extraction, yet barred owls are displaced by logging in progress as well as spotted owls, increasing the competitive pressure for remaining habitat. Barred owls also predate red tree voles; conservation of viable habitat, especially habitat with structurally complex legacies like the fire-replaced stands in the Quartz, is important for the persistence of both spotted owls and red tree voles. Red tree voles cannot be "well distributed across their range" when the average size of a block of habitat in Oregon has diminished by ninety eight percent. Red tree vole populations exist in small isolated fragments of habitat in a sea of clearcuts and plantations and have limited channels for dispersal and genetic exchange.

Matrix S&G and other elements of the NWFP will ensure the persistence of red tree voles only when buffers are applied. Agency managers are exploiting loopholes in the NWFP to circumvent habitat conservation elements of the NWFP, and they are sharing their efforts to circumvent habitat requirements with other agency personnel. The FOIA'd emails received by Benton Forest Coalition reveal that the District Biologist repeatedly sought and received advice on previously implemented NHP site designations for red tree voles.

The NHP Site Proposal cites the Connectivity Corridor, yet a simple examination of the maps reveals that the only record of a red tree vole site within the Corridor is proposed for NHP designation; both the Quartz Project and the adjacent Calapooya Project will degrade already severely fragmented habitat for red tree voles.

Thank you,



Reed M. Wilson
Benton Forest Coalition
203 SW 2nd ST.
Corvallis OR 97333
541 754 3254 Tues-Fri 10-6

Gabriel Scott
In-House Counsel
Cascadia Wildlands
POB 10455
Eugene OR 97440
gscott@cascwild.org

Doug Heiken
Oregon Wild
PO Box 11648
Eugene OR 97440
541.344.0675
dh@oregonwild.org