Dear District Ranger,

I am writing on behalf of the Board and members of the Lane County Audubon Society. We appreciate the opportunity to comment on the Calapooia #53520project. Our organization is dedicated to the conservation of the natural environment with a primary focus on birds, and other wildlife and their habitats. Our members value the forest for the habitat and the ecosystem services it provides and as a place to enjoy and recreate.

W would like to commend the Forest Service for focusing its timber projects in young, dense stands. Below are some concerns regarding harvesting a relatively large amount of forest habitat.

Thinning projects in dense stands reduce but do not eliminate environmental concerns of deforestation including soil disturbance and removal of habitat. In addition to thinning, the projects include other treatments such as gap creation, etc. that remove larger numbers of trees.

The projects are designed to take trees in multiple separated parcels throughout the area. This compounds the fragmentation caused by the removal of numerous acres of trees. Fragmentation reduces biodiversity and damages ecosystem function. More edges create hotter/drier/windier microclimates favorable to fire spread. Edge habitat may be particularly injurious to birds as several studies have documented an increase in loss to predation, especially during nesting season. A recent review (Haddad et al., 2015) highlighted the concerns of fragmentation (1) It significantly reduces biodiversity and damages ecosystem function: “reducing species persistence, species richness, nutrient retention, trophic dynamics, and, in more isolated fragments, movement.” and (2) the effects are long-lasting and may not be evident until a long period after the fragmentation occurs. Fragmentation leads to smaller populations of wildlife which leaves them more vulnerable to other threats such as invasive organisms and climate change and the inability to adapt to change due to the loss of genetic diversity. Furthermore, multiple roads must be utilized to allow access to these multiple timber sites. Though temporary, they still cut through the forest and the machinery necessary for harvest will impact the area, mostly through the introduction and spread of invasive plants, the disturbance and compaction of soil, and the creation of more edge habitat and fragmentation.

Although consideration of primary habitat for the old-growth reliant spotted owl is commended, research has shown the importance of forest cover throughout the range of the owl and in order for young owls to disperse and find nesting sites of their own. The extensive amount of deforestation and the disturbance caused by the logging will still impact these vulnerable species.

Further, we would like to encourage that the environmental assessment consider other species even if they are not legally protected. Younger and medium aged forests still support a great diversity of species. One third of our North American common bird species are in decline and the biggest threat is loss of habitat. Birds are considered by many to be excellent indicators of environmental health and their decline should serve as a call for caution in extraction projects. Each year, the “State of the Birds” report is released through a partnership that includes the U.S. Forest Service and U.S. Fish and Wildlife. The 2014 report notes the large percentage of non-protected birds that are suffering population declines with western forest birds heavily represented. The report states “Keeping common birds common, while we still can, is as important as preventing extinctions of rare species.” Due to the past and ongoing logging of Oregon forests and the proportionately small amount of intact forest remaining, we believe the forest should be considered as a refuge for the many species that thrive in western forests. The 2016 report found that one third of all North American bird species are in need of conservation action. (http://www.stateofthebirds.org/2016/ ) Locally, the annual Eugene Christmas bird count has tracked area birds for the last 77 years (the National Count has occurred for 119 years.) Although most of the results from this year’s count (last week of December 2018) were considered within the typical range, expert birders reported a few alarming observations. In Oakridge, but not Eugene, raptor counts were surprisingly low. Birds that are typically counted every year but were missing this year, included pine siskins, crossbills, and Evening Grosbeaks. Throughout Lane County, wren and finch numbers were low. In Eugene, there were low counts for Northern Shrike, Pine Siskin, Spotted Sandpiper, Canvasback, and Ring-necked Pheasant, Golden-crowned Sparrow and Evening Grosbeaks. Lewis’s woodpecker is a species of concern that should be considered in management.

The economic benefits of board timber feet noted in the analysis are offset by other costs that were not included. The proposal did not provide a valuation for economic services such as water and soil quality, pollination services, and nutrient cycling that an intact forest provides. Many environmental economists argue that a carbon market valuation is inevitable and we would like to see Oregon forests well positioned in this respect. We would like to see the inclusion of carbon storage as a “purpose and need” and an analysis of the carbon costs of timber projects. The assessment did not include the value of wildlife viewing and the industries it supports which is in the several billions of dollars in Oregon. Our members in Lane County, citizens throughout Oregon, and tourists from out of state visit and recreate in the natural magnificence of Oregon’s forests. We urge that the extent and impact of logging activity be minimized so that the public can continue to enjoy the benefits of our national forest.

Thank you for the opportunity to provide public comment on the Calapooia Project

Sincerely,

Debbie Schlenoff, Ph.D.

Conservation Chair

Lane County Audubon Society

References Cited:

Haddad N.M., et al. (2015). Habitat fragmentation and its lasting impact on Earth’s ecosystems, *Science Advances, 1* (2) e1500052-e1500052. DOI: [10.1126/sciadv.1500052](http://dx.doi.org/10.1126/sciadv.1500052).

North American Bird Conservation Initiative, U.S. Committee. 2014. The State of the Birds 2014 Report. U.S. Department of Interior, Washington, D.C. 16 pages.