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Merv George
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RE: 36 CFR 218 Subpart A and B Objection of Draft Decision Notice and Finding of no Significant Impact (DN/FONSI) of the Upper Briggs Landscape Restoration Project.
<https://www.fs.usda.gov/project/?project=45593>

To All it may concern,

In response to the Draft Decision Notice and Finding of no Significant Impact (DN/FONSI) of the Upper Briggs Landscape Restoration Project (<https://www.fs.usda.gov/project/?project=45593>), I would like to submit 36 CFR 218 Subpart A and B Objections. These Objections are timely because they are submitted in signed e-mail copy to the Rogue River-Siskiyou National Forest office in Medford, OR, within 45 calendar days of the publication in the Grants Pass Daily Courier, as to the best of my knowledge on April 18, 2019.

The following is in response to a paragraph on page 3 of my comment letter quoted as follows:

“The project also includes units in beautiful, fire resistant, old-growth and late successional forest habitats on Myers Creek, Secret Creek, and Horse Creek. These forests contain important habitat for the Northern spotted owl and its primary prey source, the red tree vole. Some of the units also contain robust populations of the rare clustered lady's slipper (Cypripedium fasciculatum). Other units are located on popular recreational hiking, equestrian and mountain biking trails, including the Taylor Creek Trail, Onion Way Trail and Secret Way Trail. Logging these stands will degrade important late successional habitat, impact rare plant habitat, and damage beautiful recreational trails.”

- 1) The first Objection I would like to raise is In looking over the Draft Decision for the Upper Briggs Landscape Restoration Project, is; We've had some confusion over the classification of what you have listed as *Piperia candida*. I've seen this plant numerous times but have never known it by that. I see that Jepson has it listed as *P. candida*, but Oregon Flora Project has it listed as *Platanthera ephemera*; **And, Also the new Second Edition Joint Publication “Rare Plants of**

Southwest Oregon” Just recently published by US Forest Service and BLM. This Rare Plant Guide is a new publication published after the initiation of this project. I would propose to minimize confusion to at least list both scientific names, or the one consistent with your new publication? The scientific name *Piperia candida* is an unresolved classification of the White Flowered Rein-Orchid. Reference for clarification:
<http://goorchids.northamericanorchidcenter.org/species/platanthera/ephemerantha/>

- 2) The second Objection I would like to raise is the question as to why there is differing buffers for the two different Orchids, *Cypripedium fasciculatum* and *Platanthera ephemerantha*? Both of these plants, being Orchids have pretty much similar habitat requirements and threats. All literature I was looking at cited the same requirements and threats for both Genus, the main one being timber production! So, that would leave me to believe they should be treated similarly?

Reasoning behind Orchids having the same plant buffers.

- A. *Cypripedium fasciculatum* and *Platanthera ephemerantha* are apparently secure although vulnerable in parts of their range due to loss mostly because of habitat loss from logging. As most of the research has been done on *C. fasciculatum*, I'll use the same justification for both as research on *P. ephemerantha* is under further study. Since *P. ephemerantha* largely needs further botanical study and has similar habitat requirements, it makes sense to afford it the same protections.
- B. Most of the subpopulations of both Orchids are small and large subpopulations occur only occasionally. Both species are under numerous threats, especially habitat destruction, tree harvesting, light regime disturbance, alteration of the moisture or temperature regime, browsing, grazing, trampling, road and trail construction, fire suppression and collection which cause a continuing decline of the species on all of the estimated locations leading to the destruction of some subpopulations. These species is therefore assessed as Vulnerable (VU).
- C. Orchids have typical habitats that include mature Coniferous forest, Serpentine seeps and along stream-banks but most frequently found in mixed successional forests, mixed evergreen, mixed Conifer, Douglas-Fir forest and in Pine and Black Oak stands. These species prefer shade in dry to cool Ultrabasic soils, Granitic soils, Schist, Limestone and Quartz-Diorite. Their habitat includes a rich organic layer that supports micro-flora as the species is strongly connected with Mycorrhizal fungi. Populations have been reported from rocky to loamy soils in damp to dry sites but the species are rare in swampy ground and on rocky places. The species flower from April until August.
- D. All Orchid species are included under Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The majority of these plants are listed by U.S. Federal and State Governments.

E. The following actions are recommended for protection of Orchids:

- Protection of the sites from habitat loss and disturbances, trampling and recreational activities.
- Protection of the sites by avoiding activities that alter or remove soil, duff, or the organic matter in the species habitat area.
- Fencing the vulnerable sites to protect the species from collection and herbivores.
- Sympathetic management of isolated populations.
- Manage sites to include entire populations plus an area large enough to maintain current habitat and **associated microclimate, primarily temperature and moisture.**
- Maintain sufficient cover to avoid any more than irregular direct solar radiation on the species and the forest floor.
- Fencing and flagging the species locations in order to capture dormant plants as they do not appear above ground every year.
- Maintain decayed down logs, snags, and duff layer within the species habitat area for favorable forest floor conditions, habitat, soil moisture and mycorrhizal associates.
- Fire management as the species cannot tolerate high-intensity fire that eliminates the duff layer.
- Raising public awareness.
- Protection of living individuals of the species through legislation and legal protection which ban the species being picked or dug up.
- Ex situ conservation: artificial propagation, re-introduction, seed collections.
- Monitoring and surveillance of the existing populations and sites.
- Estimation of population sizes and study their dynamics.

Although soil and topography influence these terrestrial species (Orchids), **there is little doubt that temperature and moisture are the most essential factors that control distribution and survival of all Orchids (Correll 1978).** While it is known that a broad range of temperature and moisture regimes occur across their range, extremes haven't been recorded.

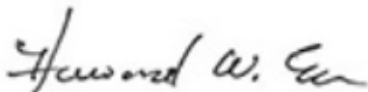
3) Directly from my letter, page #1 Upper Briggs talking points:

“Cancel logging units with large populations of the rare clustered lady's slipper orchid, including units 21 and 22.”

- In scrolling through the Environmental Assessment, I came across table 191 (located on page 124), which deals with Riparian treatment acres, which states that the primary objective is for Pine and Oak Habitat in unit 21. We have *Cypripedium fasciculatum* present in this unit with large populations, which is mostly a late successional Conifer species; **Why are we choosing a management strategy for Pine and Oak Habitat?** This is inconsistent with the management goals of *C. fasciculatum*. **All I can suggest is to drop this Unit until we can sort out what's really going on here?!**

- 4) In light of the 2018 Taylor Creek and Klondike fires, that burned together, which totaled some 228,528 Acres (according to Medford's Mail Tribune). The ecological conditions in the area encompassing the Upper Briggs Landscape Restoration Project Planning Area have drastically changed since the publication of the Environmental Assessment. As far as I can tell, all units that contained *Cypripedium fasciculatum* and *Platanthera ephemerantha* have some kind of fire effects. In light of the fact that some of these Orchids can lay dormant underground for some time after an event such as this, changed conditions due to fire may warrant more protection for botanical resources? At this time, according to the Draft Decision, the only thing I can suggest for *Cypripedium fasciculatum* and *Platanthera ephemerantha* is that I can't pin down what is happening botanically in these units now, we need to do further study! As far as I can tell, nothing is being done?
- As far as a solution, the only thing that can really be done is to give Mother Nature some time, get out there and see what has happened! For the time being, maybe units 3, 7, 21, 22, 23A, 24, 38, 13W, 24, 63, 508, and 509 should have reconsidered treatment at this time. *Cypripedium fasciculatum*, and *Platanthera ephemerantha* are special and deserve all the attention we can give them?!
- 5) In bringing this to a close, a couple of things I'd like to say about overall EA Design for the Upper Briggs Landscape Restoration Project is that we need to look at the whole
- The USDA Forest Service, as a Federal agency, is required by section 7(a)(2) of the Endangered Species Act needs to ensure that the Forest Services discretionary actions do not jeopardize the existence of a listed species, and do not destroy or adversely modify designated critical habitat.
 - Myself, and others have been led to believe that by discretionary actions as described in these decisions by the Forest Service adversely affect habitat. Considering The Effects and location of the Klondike and Taylor Creek Fires, and other decisions, I personally believe that the units containing Sensitive and Rare plants need much more time to be assessed as at this point we do not really know what the true future effects are going to be, and don't have a true sense of how our plant populations are going to respond. I feel it would be irresponsible to make a final decision for these units here at this time?

Thank You,



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Member KS Wild