



SISKIYOU CHAPTER

Native Plant Society of Oregon

*Dedicated to the enjoyment, conservation, and study
or Oregon's native vegetation*

Rogue River-Siskiyou National Forest
Forest Supervisor, Merv George Jr.
3040 Biddle Road
Medford, Oregon 97504

June 2, 2019

Upper Briggs Landscape Restoration Project Objection as per 36 CFR 218, Subparts A and B

Project name

Upper Briggs Restoration Project

Responsible Official

Forest Supervisor, Merv George Jr.
Rogue River-Siskiyou National Forest Supervisor Office

Thank you for accepting this Objection pursuant to 36 CFR § 218 from the **Siskiyou Chapter Native Plant Society of Oregon** (SCNPSO) regarding the Upper Briggs Restoration Project Draft Decision Notice.

SCNPSO is a 501(c)(3) non-profit corporation based in Ashland, Oregon with members throughout southern Oregon, including the Illinois River Watershed where this project is located. We formed for charitable, educational and scientific purposes, namely the preservation, conservation, and study of the native plants and vegetation of Oregon, and public education about the values of native flora and its habitat.

Scope of Objection

As per 36 CFR § 218 this Objection is to the draft decision to conduct commercial logging, meadow restoration, and road construction in the Upper Briggs Valley. The proposed activities will significantly impact sensitive plant species, especially in areas regenerating from the 2018 Taylor-Klondike Fire. Logging in sensitive post-fire environments will negatively impact soils and hydrology, resulting in impacts to sensitive plant species.

The SCNPSO's primary objection to the Upper Briggs Landscape Restoration Project is that the project will degrade habitat for sensitive plant species, damage important ecological values, spread noxious weeds, as well as violate the Siskiyou National Forest's Land and Resource Management Plan.

The SCNPSO is opposed to post-fire logging. This project, in particular, will degrade native plant habitat by logging in regenerating post-fire environments where the Taylor-Klondike Fire already reduced fuels and reintroduced fire to the landscape — there is no further need for thinning or fuel reduction in the area, as the fire has already accomplished the goals of the Upper Briggs Project. Logging in the Upper Briggs Project is unjustified and is a waste of public money when there are areas throughout the RRSNF that are in dire need of thinning. The Taylor-Klondike fire has already burned through the area and has accomplished the goals the Upper Briggs Project set out to achieve; logging now will only set back the fire resiliency and ecological restoration achieved by the 2018 Taylor-Klondike Fire.

Objection 1

The Decision Record does not protect sensitive plant species or intact native plant communities.

The SCNPSO is concerned about the presence of rare and special status plant species within the Upper Briggs project area, such as *Cypripedium fasciculatum* (Clustered lady's slipper), *Iliamna lactibracteata* (California globe-mallow), *Pyrola dentata* (toothed wintergreen), and *Sophora leachiana* (western sophora). All of these species have occurrences within and adjacent to the units in the Upper Briggs project.

The presence of special status plant species within the project area presents a higher standard for land management practices in order to not only buffer existing special status plant sites, but also the overall habitat in which that species occurs. Due to the post-fire environment, logging within the habitat for special status plant species is likely to degrade habitat.

SCNPSO's board and members have a special interest in special status plant protection and conservation. We have a vested interest in the project area principally because of the occurrence of species such as these rare plants. SCNPSO's board and members regularly visit Forest Service land within the project area to enjoy these species and to botanize in general.

Small buffers do not protect these species enough for ongoing dispersal habitat. Because of their limited numbers, special status plants need habitat protection to ensure their long-term viability and dispersal. Small buffers are not enough.

Proposed Resolution of Objection 1

Cancel all logging proposed in areas with special status plant species.

Objection 2

Non-native, noxious, and invasive plant spread is likely to occur in the the Upper Briggs Project. The SCNPSO is concerned about the spread of noxious and invasive plant species due to logging activity in the Upper Briggs project. Because the proposal includes thousands acres of logging, there is a strong possibility that a large portion of the Briggs Creek Watershed will see increases in noxious and invasive plant species. Post-fire soil disturbance at this scale is surely going to result in massive noxious weed spread. Scaling back the project is the best way to limit likely spread.

Of particular concern is the current presence of non-native and invasive plant species along roadsides within the Upper Briggs project area. Scotch broom, bull thistle Canada thistle, meadow knapweed, spotted knapweed, sweet clover, sulfur cinquefoil, and madusahead grass are pervasive within the project area. Not only is cleaning equipment a priority to prevent noxious weed spread, but also keeping an adequate forest canopy so that noxious weed spread does not have an opportunity to invade opened stands. Opening forests too much too quickly facilitates noxious weed spread and understory conversion from native plants to non-native plants.

Proposed Resolution of Objection 2

Cancel all logging in areas with currently known populations of non-native, noxious or invasive plant species.

Objection 3

Cypripedium fasciculatum (Clustered lady's slipper), in particular, needs habitat protection for its exclusive pollinator, a small diapriid wasp, just as much as it needs habitat protection for individual plants. Without protection for the exclusive pollinator, *C. fasciculatum* will languish without pollination services. The pollination ecology of *C. fasciculatum* should have been considered as part of the analysis during project planning for the Upper Briggs Project.

From the Conservation Assessment for Cypripedium fasciculatum:

“Recent research on the pollination biology of *C. fasciculatum* in southwestern Oregon suggests that stingless parasitic wasps (Family Diapriidae, Subfamily Belytinae, genus *Cinetus*) serve as pollinators of *C. fasciculatum* (Ferguson and Donham 1999, Ferguson et al. 2000). Prior research presumed *C. fasciculatum* was pollinated by flies or fungal gnats due to its morphology, inconspicuous coloration, and unique odor (Knecht 1996). However, more recent studies document only female diapriid wasps carrying *C. fasciculatum* pollinia and suggest diapriid wasps as pollinators (Ferguson and Donham 1999, Ferguson et al. 2000). Diapriid wasps oviposit in dipteran hosts (primarily fungal gnats), which may be attracted to the orchid. Although wasps are known to visit the orchids *Epipactis helleborine* and *E. purpurata* with flowers similar in color to *C. fasciculatum* (Proctor et al. 1996), the mechanism by which the orchid attracts the wasp is unknown. It is possible that attracting the wasp pollinator involves a complex series of steps beginning with attracting the fungal gnat to the flower.

Cypripedium fasciculatum is a non-rewarding orchid (no nectar or pollen benefits to the pollinator) and as such may have difficulty attracting pollinators. Generally with non-rewarding orchids the reproductive success rate is relatively low. The average for North American nectarless orchids is around 20 percent (Lipow et al. 2002). Correll (1950) and Barker (1984) suggest that *C. fasciculatum* has relatively low fruit production. Barker (1984) believes that pollination is an infrequent event. Harrod (1993) found that only 31 percent of the observed flowers produced capsules. However, fruit set in open pollinated flowers of *C. fasciculatum* was found to be 69 percent for plants in a site sampled in southern Oregon—higher than in plants sampled at sites in Idaho and Colorado (Lipow et al. 2002). The large number of seeds produced per capsule is estimated to average 3,874 per fruit (Harrod and Knecht 1994) which may compensate for relatively low levels of fruit production. A greater limitation to population persistence may be due to factors that relate to the post seed production phase of the life cycle. (Conservation Assessment for *Cypripedium fasciculatum*, p. 9).”

C. fasciculatum can be aged by bud scars and studies have shown that plants can live to be over 100 years old. These “old-growth” plants will be impacted by project implementation in the Upper Briggs project, especially in the sensitive post-fire environment.

Proposed Resolution of Objection 3

Either cancel all units with *Cypripedium fasciculatum* populations or create supplemental analysis that assumes extirpation of populations subjected to fire and logging impacts. The cumulative impact of wildfire, followed by logging was not adequately analyzed in the Final EA and was not considered in the Draft Decision Notice.

Objection 4

Fire adapted sensitive plant species that require fire to sustain their populations have been restored within the Taylor-Klondike Fire and no longer need “restoration” treatments as proposed in the Upper Briggs Project. The Taylor-Klondike Fire reintroduced wildfire process and created favorable growing conditions, making restoration treatments unnecessary.

Treatments were proposed in the Upper Briggs Project to enhance rare plant populations of both *Sophora leachiana* and *Illiamna latibracteata*. Both species are dependent on disturbance to sustain viable habitat conditions and allow populations to persist, regenerate and expand. The disturbance necessary to provide for species persistence was accomplished by the 2018 Taylor-Klondike Fire. The fire created the specific conditions described in the Final EA without the need for further management.

***Illiamna latibracteata* (California globe mallow):** The California globe mallow is found predominantly in southwestern Oregon and northwestern California from Humboldt County to Linn County in Western Oregon. A significant concentration of the Oregon population is located in the Briggs Creek Watershed.

According to the Final EA, “*California globe mallow is an early seral disturbance dependent species that needs somewhat open canopies to survive. Low to high burn severity fires are necessary for the species seeds to propagate. The optimum percent canopy cover necessary for the health of populations is site specific. Factors regulating populations vigor include slope, aspect, soil moisture, temperature, and others. The species is also dependent upon fire to germinate seeds within the populations seedbanks.*” (USDA. 2019a. P. 217). The 2018 Taylor-Klondike Fire created these conditions by burning at mixed severity, creating patches of mortality, thinning back competing woody vegetation, triggering seed germination, and encouraging health populations.

The Final EA described conditions similar to the effects of the 2018 Taylor-Klondike Fire as desired conditions and acknowledge that natural fire effects may be beneficial to this species by stating “*The no action alternative may be beneficial to the species providing wildland fire intensity is not too extreme as to eliminate seed banks, individuals and render habitat as unsuitable.*” (USDA. 2019a. P. 210). The 2018 Taylor-Klondike Fire was just such a fire, not too extreme to damage existing populations and with enough diversity in fire effects to create small openings, burn back brush, duff and ground fuels, reduce vegetative competition, trigger seed germination and prepare bare mineral seed beds without impacting existing plants or burning up seed load.

Restoration of California globe mallow in the Briggs Creek watershed has been achieved and no treatment is necessary to “restore” disturbance process and favorable growing conditions. The fires have done this naturally, negating any need to implement manual treatments. In fact, at this point manual treatments are highly likely to do more harm than good. Logging and the soil disturbance associated with yarding activities will now only damage plants in fire reinvigorated populations and provide an additional disturbance and opportunity for the spread of noxious weeds. Risks to the existing populations will only increase with implementation. The agency has no justification to continue unproven and ecologically risky treatments in protected rare plant populations, when natural process has achieved the desired results. The project has the potential for unforeseen impacts, while providing little additional benefit to the species in question.

The agency has no justification to continue unnecessary and ecologically unproven treatments in rare plant populations. The objectives have been achieved naturally and ecological process should be allowed to rejuvenate these populations.

It is highly unlikely that previous plant surveys can adequately reflect the population of California globe mallow in the Briggs Creek Watershed. The known populations have likely expanded and previously unknown or new populations likely exist within the fire area. The species is “*disturbance loving*” and needs characteristic mixed severity fire effects for its persistence. The Taylor-Klondike Fire provided the necessary habitat alterations to meet this species’ needs.

Sophoria Leachiana (Western sophora): The Western sophora is an endemic species found in a 20 x 6 mile area along the Illinois River and Rogue River. Much of the world’s

population is located on Briggs Creek and in the adjacent Taylor Creek Watershed. The species is dependent on disturbance such as mixed severity wildfire to persist and thrive. The need to restore habitat conditions and reintroduce disturbance within populations of Western sophora was satisfied by the 2018 Taylor-Klondike Fire, which burned most of the world's Western sophora populations. Essentially, the entire population of this disturbance dependent species received characteristic fire effects. It is expected that populations will grow and expand due to overstory mortality, the reduction of competing woody vegetation, the burning of duff and leaf litter, and the creation of bare mineral soil for seed reproduction. Populations near the mouth of Briggs Creek along the Illinois River have expanded significantly since the 2002 Biscuit Fire, demonstrating a resilience to low, moderate and even high severity fire. The population near the mouth of Briggs Creek has expanded, producing far more flowering plants, far more flowers and much more seed each year since the 2002 Biscuit Fire. The effects of the 2018 Taylor-Klondike Fire in the Upper Briggs Watershed have been very similar with positive effects, expanding and reinvigorated populations throughout the fire footprint.

Restoration has been achieved in Western sophora populations and additional disturbance from logging and yarding activities has the potential to damage these important populations during this important period of vegetative recovery. The logging activities could damage plants and populations, while creating conditions conducive to noxious weed spread. No positive effect can be attributed to creating widespread logging and yarding disturbance during what will be the plant's most natural period of abundance. According to the Final EA, *"Individuals may receive direct impacts from crushing, burning, and killing individuals by skyline logging, felling trees, and prescribed fire. However, the projects short term direct impacts will be outweighed by the projects long-term beneficial effects."* (USDA. 2019 a. P. 218). The long-term beneficial effects have been achieved in the Taylor-Klondike Fire and the post-fire condition is restoration for this species — logging will only increase the risk of detrimental effects and provides no additional benefit beyond the effects of the 2018 fires.

Current post-fire hazard tree logging operations on Taylor Creek have heavily impacted otherwise strong, reinvigorated, post-fire populations of Western sophora (Fig. 3 & 4). Crews have made log decks and stacked large machine piles directly on populations of sophora. These populations will be heavily impacted by mechanical damage, pile burning and noxious weed spread. These impacts were not considered in the Final EA or Draft Decision Notice as part of the existing conditions or considered as impacts likely to occur during implementation of the Upper Briggs Project.

The Final EA discloses that, *"An extensive occurrence of western sophora within the footprint of the proposed project was located during project surveys. Populations are found in units 2, 3, 3S, 5, 9, 14, 15, 16, 35, 48, 240, 262, 503, 504, 505, 506, 510, and 652."* (USDA. 2019a. P. 218). These populations will only be negatively impacted by project activities. The Final EA also discloses that, *"Sophora is also dependent on disturbance to colonize areas and the no action alternative may be beneficial to the species if there is a fire providing the fire intensity is not too extreme for the species."* The agency continues by stating, *"Without fire this occurrence is at risk to be unable to*

germinate seeds to produce new individuals and may in time be extirpated. Fire will create habitat disturbance that is necessary to promote western sophora populations.” (USDA. 2019a. P. 210). The Taylor-Klondike Fire was just the sort of disturbance described as beneficial and necessary in the Final EA. There is now no need to mimic that disturbance with manual treatments, it has been achieved naturally through wildfire effects.

According to the Final EA the intent of treatments in sophora habitat is *“to create disturbance for western sophora including adding fire to the landscape and canopy reduction.”* (USDA. 2019a. P. 301). These objectives were achieved to a high degree in the Taylor-Klondike Fire and the natural fire recovery following the necessary disturbance is highly important to these populations and should not be disturbed. The Final EA acknowledges impacts associated with commercial logging and skyline yarding; these impacts are unnecessary and unjustified in rare plant habitat that makes up a significant portion of this plant’s worldwide distribution and has already benefited from fire/natural disturbance based restoration. Adding fire is no longer needed at this time and all sophora units should be deferred. Manual treatments have only the potential to impact these important, endemic and significantly restricted populations of Western sophora.

It is also likely that surveyed and existing populations have expanded and new populations may have become established throughout the planning area due to the effects of the Taylor-Klondike Fire. The current survey and Final EA analysis are likely inaccurate because of restoration of sophora populations in the 2018 fire footprints.

Proposed Resolution of Objection 4

Cancel all proposed units within Sophora leachiana and Illiamna lactibracteata habitat. Restoration has been achieved and natural process is the most proven form of enhancement for these rare plant species. Given the certainty of beneficial effects from the 2018 wildfires and the certainty of impacts associated with logging and yarding activities, all units within these rare plant populations should be canceled.

Objection 5

Proposed meadow restoration treatments will degrade meadow habitats and are inconsistent with the SNF Plan. Horse Creek Meadows and Sam Brown Meadows are being proposed for “Meadow Restoration” treatments in the Upper Briggs Project. The project area includes 188 acres of Meadow Restoration Treatments. These treatments include “restoring” the meadows to the area depicted in the 1940 aerial imagery by logging surrounding forest habitats and individual trees or groves of trees that have established within the meadow system.

Although in general, meadow restoration is often broadly supported, the treatments proposed in the Upper Briggs Project are controversial, will degrade meadow habitats, reduce habitat complexity and are inconsistent with the SNF Plan.

Treatments will include the removal of “*all conifers within these [1940] boundaries but retaining legacy trees (greater than 120 years) and hardwoods > 10” diameter*” (USDA 2018d p. 6). This means that closed canopy forests will be clearcut, adjacent to the current meadow margin. It also means that all trees within the meadow and meadow margin will be logged, because few, if any, appear to meet the standards for legacy retention. The removal of trees within the meadow will reduce habitat complexity and eliminate tree recruitment that likely replaced open-grown trees logged for building material, firewood and to extend agricultural activities.

Current tree density within the meadows is minimal and is not degrading or suppressing the herbaceous plant community typical of dry and moist meadow habitats. This is especially true in the Horse Creek Meadow system where scattered groves of pine and oak grow among a few scattered Douglas fir. The trees found in Horse Creek Meadows cannot be characterized as encroachment, but are rather, reproduction, replacing trees felled by homesteaders, ranchers, miners and others in the settlement and mining area.

Some trees within Sam Brown Meadow could be considered to be “encroaching,” but the vast majority are non-merchantable and could be removed with non-commercial treatments.

Isolated, open groves of conifers and individual, open grown trees within the meadows provide important perching habitat for birds and raptors, the shade provides bedding and resting locations for ungulates, wildlife of all sorts utilize the vertical structure, cover, shade and high perches provided by these meadow-grown trees. These values should be promoted in Special Wildlife Areas such as Horse Creek Meadows and Sam Brown Meadows.

The SNF Plan pages IV-115 to IV-119 identifies Standards and Guidelines for the Horse Creek and Sam Brown Wildlife Management Areas, these include retaining large, live trees or girdling live trees to reduce encroachment. The Standards & Guidelines state the “*Dead trees (standing or down) should not be removed.*” This direction is very clear and is being violated in the Upper Briggs Project and its misguided “meadow restoration” treatments. Standards & Guidelines also state that live trees that “*must be killed should be girdled and left standing unless realization of meadow management objectives would be hampered.*”(USDA 2018a p. 66). Despite these recommendations the Upper Briggs Project proposes to remove nearly all trees within the meadow and meadow margin, logging the trees rather than retaining snags and downed wood. The density of trees within the meadow will not hamper management objectives, instead they currently provide important functions in meadow habitats.

Standards & Guidelines also stress retaining complexity, unaltered vegetation at the meadow margin to maximize edge effects and biodiversity. These meadow buffers are described as extending up to 200’ from meadow edges. Guidelines require that no more than 1/3 of the meadow margin should be removed in a 20 year period. (USDA 1989 p. IV-117). Meadow Restoration prescriptions will remove far more than 1/3 of the current

meadow margin, they also propose logging the newly created “meadow edge” by implementing commercial pine-oak treatments on Doug fir sites.

The level of tree removal in existing meadow margins and the removal of all trees less than 120 years old within the meadow complex violates the SNF Plan. Based on the SNF Plan we object to any proposed logging unit within the 200’ meadow buffer. This pertains to both existing and “restored” meadow edges.

Proposed Resolution of Objection 5

Cancel all meadow restoration units and instead implement a cycle of repeat prescribed fire in the meadows surrounding Sam Brown Campground and at Horse Creek Meadows.

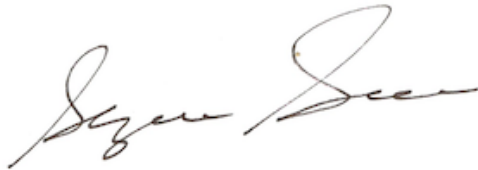
Objection 6

The Upper Briggs project proposes logging in stands over 100 years old in violation of the SNF Forest Plan. Logging stands over 100 years old is not recommended in the SNF Plan. Although the EA claims no trees over 120 years old will be logged, very little monitoring protocol is in place to ensure compliance. Likewise, the current prescriptions include canopy cover and basal area targets that will require the removal of large, old trees over 120 years of age.

Proposed Resolution of Objection 6

Cancel all proposed commercial logging units in stands over 100 years old.

/s/ Suzie Savoie

A handwritten signature in cursive script, appearing to read 'Suzie Savoie', written in dark ink.

Sincerely,
Suzie Savoie
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