

From:

16 July 2019

To: Johnathan Tucker, District Planner  
Middle Fork Ranger District  
46575 Hwy 58  
Westfir, OR 97492

Re: Youngs Rock Rigdon Project Scoping Comment

These are my comments to the Youngs Rock Rigdon Scoping letter. I've been aware of this project since September 2018 when I exchanged a few emails with Alan Nambrick of the Forest Service and Sarah Altemus-Pope of the Southern Willamette Forest Collaborative. As a rule I approach all projects developed through collaboratives with suspicion due to my experiences in central & eastern Oregon with Blue Mountains Biodiversity Project, where I've seen proposals to clearcut old fir stands around popular recreation areas rammed through in the name of restoration.

First off, I support the decommissioning and closure of roads as mentioned in the document. I would support an increase of the mileage of that.

I oppose the construction of new spur roads or development of rock pits. I have concerns that these will increase sediment flow into streams and cause stream temperature increases. I have concerns that the construction of these will have impacts to species sensitive to noise and dust. I have concerns that new roads will increase the amount of illegal ATV/offroad vehicle access and its associated effects. Please demonstrate through analysis how the mentioned rehabilitation methods proposed for these temporary roads will minimize soil (1)

erosion and maintain water quality as you claim. Has this been studied + proven? Even in a "rehabilitated" state I have concerns that these temporary roads would be a factor enabling further disruptive intrusion. If you disagree please show why studies have indicated this.

Regarding purposes and Needs mentioned in the document, why is "more late seral open forest" needed? please analyse the current extent of late seral open forest and the potential for wildfire to create this naturally. What is your quota for late seral open forest? How does thinning accelerate the development of late seral patch connectivity? Can this development also be achieved by natural disturbances like fire, disease, and windthrow? What is your quota and the current extent for late seral patch connectivity - why <sup>does</sup> it need enhancement here? Please explain why a "Regeneration harvest [which] includes retaining at least 15% unthinned in clumps" is different from a "clearcut next to a clump - FS people tell me constantly that you don't clearcut. Isn't that just an 85% clearcut?"

I question the validity of "fuel reduction treatments around adjacent private industrial forest". Is your intent to protect industrial forest from fires ignited on NF lands? Where is that a FS mandate? I understand wanting to protect urban areas and WUI's, but doesn't industrial forest spark more forest than NF land? please analyse the rates of fire ignition + spread from private land vs. NF land. What is the scientific evidence that thinning prevents fire spread? don't low-severity <sup>naturally ignited</sup> fires accomplish the same as proposed thinning + underburning? Please analyse how naturally ignited low severity fires reduce fuels.

Regarding Aquatic ~~Meadow~~ restoration, you have not explained why these <sup>thrs</sup> are needed. Please do so. What are the ACS objectives you need to meet? please analyse the widest possible range of methods which can be used to achieve them and include - rely on

natural disturbances & processes including floods, fire, windthrow & disease & natural mortality, <sup>and</sup> method of achieving as many ACS objectives using only manual methods and no heavy equipment or chemical treatments. Please analyse for impacts to 303(d) listed impaired streams or sections of rivers and show why & how ~~affected~~ proposed actions would not violate Clean Water Act standards for impaired streams including all downstream sections of rivers. I have concerns that riparian actions would increase <sup>stream</sup> temperature, turbidity and affect fish, amphibians, and microinvertebrates. I have concerns that any short-term increase in these factors or sedimentation would be significant.

Regarding Meadow restoration, why is this ecologically necessary? what current ecological problems does it address? Does it create habitat for any endangered and sensitive species other than monarch? What is the quota for meadows and why are more needed? If you believe these areas should be "restored" because they were in a particular condition in the past, how do you know they were that way? Show evidence of historical condition. There is a difference between attempting to recreate a previous condition and a "vital" need as the introduction describes this project. I do not consider aesthetic or historical rationales "vital", I consider maintaining healthy ecosystems, taking the lightest touch possible, and conserving all stored carbon vital. I support noxious weed treatment where appropriate. Please create a "decision tree" that preferes manual methods over mechanical methods and those over chemical treatments. Please include protocols which, when chemical treatments are used, preferes compounds which are non- or less- bioaccumulating and non- or less fugitive/leaching and non- or less persistent, and application methods such as spot application/backpack spraying over

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broadcast spraying. Consider not treating populations of "noxious" weeds which are not spreading nor causing harm to ecological processes.

Sincerely,  
Cooper Otte