



KALMIOPSIS
AUDUBON SOCIETY

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Merv George, Forest Supervisor, Rogue River Siskiyou National Forest
Wade McMaster, Gold Beach District Ranger
c/o Objection Reviewing Officer for R6 Regional Office
Sent via email to <objections-pnw-regional-office@usda.gov>

Regarding: Objection to the Final Shasta Agness Landscape Restoration Project Environmental Impact Statement (FIES) and Draft Record of Decision (DROD)

Dear Merv and Wade,

Thank you for responding to our comments and concerns on the Shasta Agness Landscape Scale Draft Environmental Impact Statement. As an organization that has long participated and is currently a board member of the Wild Rivers Coast Forest Collaborative (WRCFC), we have been disappointed that Alternative 1 did not incorporate more of the collaborative's vision and desires for this project.

We do not feel that all of our concerns were adequately addressed in the FEIS and remain deeply concerned about several components of this project and their potential impacts, the major ones being:

1. Commercial harvest in Riparian Reserves – and the possibility of increased stream temperature
2. Commercial harvest in serpentine pine areas – and the potential to irreparably damage soil and cause harm to coastal marten through habitat decrease/degradation (considered for listing by USFWS)
3. The almost certain increase of invasive species in oak savanna restoration areas due to timber activity and increased OHV use
4. The large scale and short timeline of the project, and ability to properly implement and monitor for desired outcomes (oak success and recruitment), especially with the spectrum of variation of stand types in proposed oak restoration units and the potential of the project-specific plan amendment to undermine the goals of the Northwest Forest Plan

We do not support these components of Alternative 1. We remain committed to stay engaged in this project both as an organization and as a member of the WRCFC. In response to the above concerns, we have the following requests:

1. The USFS should drop commercial harvest in Riparian Reserves, and coordinate with other agencies or nonprofits (such as ODFW or the South Coast Watershed Council) to monitor stream temperatures in key locations, including Shasta Costa Creek, before, during, and after sales begin to be implemented in the project area.
2. The USFS should drop commercial harvest in serpentine pine units. We also request that before, during, and after treatment in serpentine pine units, the USFS allow us to partner with the project administrator to monitor for proper implementation of standards aimed at protecting sensitive soils and coastal marten habitat.

3. We request that the USFS prioritize installation of barriers to off-trail OHV use in key locations, including Snout Creek at the time the trail is reopened, to minimize spread of invasive seeds. We also request that the USFS prioritize revenue from the project to be directed to monitor and eradicate invasive species that will increase as a direct result of the project.
4. We had asked for a small portion of oak restoration to be implemented first and monitored for success before implementing the full scale of the project, given the many uncertainties, but we see that all the Oak Flat sales are scheduled to begin early next year with Shasta Oak sales following the next year. We do not believe that implementing such a large project with so many units (and of varying stand types) in a short time frame follows best practices for adaptive management. We request that implementation of oak restoration units be administered over a longer period of time in order to provide opportunity to adapt management (for example, beginning with a portion of with the Shasta Oak/Oak flat sales before implementing the entire sale for either portions, and implementing over four years instead of two). We request that the sale administrators, silviculturists, and botanists clearly communicate about proper implementation and provide opportunities to organizations in the WFCRC for post-harvest field visits to track whether existing oaks respond positively, if natural recruitment occurs, if oaks can overtake weeds – and if not, to amend prescriptions for future sales, plan for aggressive weed control and planting and shielding oak seedlings, etc. We also request that sufficient funding from this project's harvest revenue be allocated to monitor for these project goals and to remedy any that fall short. In regards to the goals of NWFP, we request that the USFS abandon the project-specific plan amendment in healthy native mixed conifer/hardwood stands in which the oak species is mainly black oak. In addition, the USFS must either conduct protocol surveys for marbled murrelets in any suitable habitat (a tree with platform branches at least 4 inches in diameter and at least 10 meters off the groundⁱ), or assume occupancy for habitat trees (and provide the appropriate buffer, follow nesting season restrictions for noise/disturbance, etc).

As a local conservation organization with members in the Agness community and throughout Curry County that has been invested in our public lands for 40 years, we believe these are reasonable requests that would be beneficial both for project success and building trust with the local community. We request an opportunity to discuss these objections and requests with you.

Sincerely,



Ann Vileisis

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Teresa Bird

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ⁱ Mack, D.E., W. P. Ritchie, S. K. Nelson, E. Kuo-Harrison, P. Harrison, T. E. Hamer. 2003. *Methods for Surveying Marbled Murrelets in Forests: A Revised Protocol for Land Management and Research*. For the Pacific Seabird Group Marbled Murrelet Technical Committee. Page 2.