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Merv George (Reviewing Officer)
Forest Supervisor
Rogue River-Siskiyou National Forest
Attn: 1570 Appeals and Objection
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RE: Stella Landscape Restoration Project Objection as per 36 CFR 218

- **Project Name: Stella Landscape Restoration Project**
- **Responsible Official: Forest Supervisor Merv George**
- **Rogue River-Siskiyou National Forest, High Cascades Ranger District**

Thank you for accepting this Objection pursuant to 36 CFR § 218 from the Klamath Siskiyou Wildlands Center (KS Wild), Oregon Wild and Cascadia Wildlands regarding portions of the Stella Landscape Restoration Project. For the purpose of this Objection KS Wild is the “lead objector.”

While we support elements of the proposed project, we are disappointed by the agency’s decision to construct new logging roads, log and yard in riparian reserves, remove large trees, downgrade existing late-successional spotted owl habitat, and conduct logging activities in backcountry unroaded portions of the project area. Our organizations would like to support a project that focuses on forest restoration and public safety, but we are concerned that the Stella draft decision authorizes actions that harm, rather than aid, forest health. **In particular we believe that logging prescriptions that are “likely to adversely affect” Northern spotted owls and US Fish and Wildlife Service designated critical habitat are antithetical to the achievement of forest restoration objectives.**

We do appreciate the agency’s procedural acknowledgement of our concerns stemming from our comments. Yet it appears that our concerns were only addressed procedurally and had no

impacts whatsoever on project layout and design. Our organizations frequently support Forest Service projects that foster, rather than inhibit, forest health, and we are disappointed that the agency was not willing to work with us to reduce avoidable harm to forest wildlife, soil and aquatic resources in the Stella project area by incorporating the achievable habitat and riparian mitigations measures contained in Action Alternative 3.

We are very concerned and disappointed that the Stella NEPA process appears to have been designed to result in an inevitable and pre-ordained decision to implement the maximum logging alternative in which 87 mmbf of timber is produced, spotted owl habitat is downgraded, native forests in riparian reserves are logged, occupied red tree vole habitat is removed, unroaded forest are logged and the negative impacts of widespread cattle grazing remain unaddressed. Restoration is more than just logging- it requires a holistic approach and substantive collaboration. From our perspective it does not appear that substantive public comments regarding forest restoration activities had any meaningful influence on the outcome of the project.

Scope of this Objection

As per 36 CFR § 218 this Objection applies to the following activities authorized in this project:

1. Logging Unroaded Areas
2. Logging Riparian Reserve Comprised of Native Forests;
3. Downgrading Northern spotted owl Nesting Roosting and Foraging Habitat;
4. Large tree removal (greater than 24 inches dbh);
5. Group selection logging;
6. The construction of new logging roads.

While all of the significant and cumulative impacts of the activities listed above are of concern to our organizations, *our primary concerns with the project involve the significant impacts of logging unroaded areas, riparian reserves and spotted owl habitat.*

Our December 15, 2020 comments regarding the Stella project Draft Environmental Impact Statement (DEIS) previously raised the issues that are the basis of this Administrative Objection and are part of the Administrative Record for this project.

Objection Point #1: The Deleterious Impacts of Logging Roads are Significant and Widespread

The Rogue River-Siskiyou National Forest has concluded on page 23 of the Upper Rogue Watershed Analysis that “[t]hroughout the watershed there is a high density of roads, which have altered natural drainage – increased peak flows, transferred runoff from one drainage to another, blocked fish access to sections of streams – and have resulted in a lowering of the quality of aquatic resources in the watershed.”

At S-2 of the Stella FEIS the Forest Service acknowledges that forest stands in the project area are “highly fragmented.” Page 17 of the Upper Rogue Watershed Analysis indicates that “[f]ragmented habitat provides poor dispersal mechanisms for many species in the watershed.” This is of particular concern given the encroachment of Barred owls on spotted owl activity centers given that “[i]ncreased fragmentation will favor competitors and predators of the northern spotted owl.” Upper Rogue Watershed Analysis page 17. It is incontrovertible that road construction, road reconstruction, and log landing establishment directly and cumulative contribute to forest fragmentation. To achieve the Stella project restoration objectives, forest fragmentation should be reduced, rather than increased.

While page 11-15 of the Stella FEIS acknowledges scientific uncertainty regarding the significance of thermal cover for local elk populations the page goes on to express certainty that reduction of road density would aid elk productivity in the project area.

Page III-32 of the FEIS indicates that:

Temporary roads are typically constructed with no engineering specifications since they are targeted to be used for a short time (ideally a single season), and then obliterated. This lack of construction design makes it particularly important to follow Project Design Criteria (Chapter II) for avoiding potentially unstable slopes, even with the potentially short time frame of use. This is because even temporary roads which are constructed with road cuts in steep, unstable terrain can trigger debris avalanches and slope failures by removing downslope support and interfering with surface and subsurface water flows that can weaken slopes.

Page III-33 of the FEIS states:

*Temporary roads (use of existing templates and new templates) are expected to have a long-term, and sometimes irretrievable, reduction in soil productivity since they are bladed (soil is mixed and displaced) and compacted and increase the potential for soil erosion. Even once rehabilitated, **the soil profile is modified to a degree that may take many decades to return to the productive state of the undisturbed forest soils adjacent to it.** (emphasis added).*

As disclosed on page 10 of the Upper Rogue Watershed Analysis, restoration of soils compacted by logging road construction (and project yarding and log landings) is likely to be difficult given that “[s]ixty percent of the Western Cascades Range has clay-rich soils, which compact easily...Clay-rich soils do not respond well to restoration efforts once damaged.”

The significant deleterious impacts associated with road construction and reconstruction are not limited to soil and wildlife resources. The invasive plant species and noxious weeds analysis presented in the FEIS is quite clear that the larger potential vector for noxious weed spread is the construction and reconstruction of logging roads. The efficacy of past noxious weed PDFs associated with road construction has been spotty. In the Stella project a vast network of closed roads are proposed for reconstruction and the Draft Record of Decision calls for significant new logging road and log landing establishment. It is foreseeable and likely that these actions will directly and cumulative contribute to noxious weed spread in the project area.

Please note that the Stella FEIS does not analyze or disclose the impacts of temporary road construction and reconstruction on unroaded forest values. While page III-293 of the FEIS indicates that the selected action alternative involves road construction and reconstruction within unroaded forest blocks, the impacts of road establishment upon the values that many Americans find in unroaded forests are not discussed or addressed in the FEIS or DROD.

In our comments on the Draft Environmental Impact Statement (DEIS) we recommend rather than procedurally analyzing the significant impacts of such road construction in the (then) forthcoming FEIS, that the Forest Service please drop its plans to create additional logging roads in unroaded forest stands. This request was not responded to by the Forest Service or acknowledged in the DROD.

Proposed Objection Resolution Item #1: To achieve a sustainable transportation system, implement the road decommissioning initially proposed (in the DEIS) in Alternative 2 and avoid new construction as contemplated in Alternative 3.

We agree with the Forest Service recommendation at page 25 of the Upper Rogue Watershed Analysis that the agency should “[e]xpeditate closing and decommissioning of unneeded Forest Service Roads based upon long term transportation planning needs” in the Stella planning area.

We are perplexed and disappointed that the Forest Service elected to implement the maximum logging alternative (Alternative 2) with the greatest impacts to late-successional forest habitat, riparian reserves and unroaded areas while dramatically reducing the road decommissioning restoration activities that were proposed in Alternative 2. Restoration is more than just logging trees, and by refusing to implement the road decommissioning activities that were part of the agency’s proposed action, the Forest Service is undermining the restoration objectives of the project.

To best “right size” the Forest Service transportation system in the Stella Project area and achieve the goals of Subpart A of the Travel Rule and implement the recommendations of the Upper Rogue Watershed Analysis the Forest Service should avoid new temporary road construction as was proposed in Alternative 3 and decommission unneeded roads as was proposed in Alternative 2. A blended alternative would avoid the significant soils and fragmentation issues associated with new logging road construction while better aligning the size of the transportation with the agency’s road maintenance funding and capabilities. The Travel Rule Subpart A recommendations for ML road status changes that are reflected in Table III-6 of the FEIS should not be linked to or contingent upon the new temporary road construction proposed in Alternative 2. In other words, by implementing the Alternative 2 road maintenance level changes and the avoidance of new temporary road construction in Alternative 3 the Stella project could still “treat” over 40,500 acres while minimizing some of the avoidable significant cumulative impacts associated with the extensive network of logging roads. ***We recommend that the Forest Service decommission unneeded roads as initially proposed in Alternative 2 and avoid new temporary road construction as contemplated in Alternative 3.***

Our request in the previous paragraph was clearly not well received within the agency as the DROD calls for maximum road construction and logging (Alternative 2) with minimum road

decommissioning (Alternative 3). Clearly our input was not valued or incorporated into the agency's decision.

As noted at page III-208 of the FEIS “[a]ll NSO sites would benefit from road decommissioning and maintenance level reduction.” Please also note that page III-271 of the FEIS indicates that “[s]hifts in elk distribution away from roads used by motorized vehicles have been documented across many areas of the western United States” such that “many National Forests in the west have incorporated this information into road density management objectives for Big-Game Winter Range areas in their Land and Resource Management Plans.” This is a crucial point given that the agency is poised to approve a project-specific Plan Amendment to reduce thermal protection requirements for elk. *If the Forest Service intends to downgrade critical Northern spotted owl habitat and log elk thermal cover then it is absolutely essential that the project implement the road decommissioning and maintenance level reduction initially proposed in Alternative 2 and avoid new habitat fragmentation from road construction (as proposed in Alternative 3) in order to meet the wildlife management objectives of the project.*

Objection Point #2: Large Tree Removal and Yarding Through Riparian Reserves

Pages II-48 and III-29 of the Stella FEIS indicate that the Forest Service intends to authorize an unknown number of 12' wide yarding corridors through riparian reserves at undisclosed locations and potentially across stream channels. We strongly oppose this yarding practice as it fundamentally undermines the purpose and integrity of the riparian reserve land use allocation. There may be some instances in existing timber plantations in which we would not object to the establishment of 12' wide cable yarding corridors, but that degree of impact in native forests serving as riparian reserves is a “deal breaker” for our organizations and a direct violation of the Aquatic Conservation Strategy of the NW Forest Plan.

Please note that the FEIS anticipates that there will be a need to fell “larger trees” in the riparian reserves to facilitate yarding operations. Again, the terrestrial and aquatic benefits of “larger trees” in the reserve land use allocation clearly outweighs the operational convenience of yarding corridors in the reserve land use allocation. The purpose of the riparian reserve land use allocation is to provide large trees for aquatic and terrestrial forest health objectives, not to serve as yarding corridors to facilitate timber production.

Proposed Objection Resolution Item #2: Implement the NW Forest Plan Aquatic Conservation Strategy Objectives by avoiding cable yarding through riparian reserves (except in timber plantations) and by retaining (and not felling) larger trees in the reserves.

Objection Point #3: Cumulative Aquatic Impacts and the Aquatic Conservation Strategy

The significant cumulative impacts associated with road construction and reconstruction along with landing establishment threaten to undermine the objectives of the Aquatic Conservation Strategy of the NW Forest Plan. Please note that as reflected on Table(s) III-35 implementation of DROD would:

- Nearly double the aquatic risk ratio for the Abbott Creek watershed and result in the watershed being in a higher risk “status” post-project;
- Further increase the already high-risk ratio in the Barr Creek watershed;
- Nearly double the risk ratio for the Takilma Gorge watershed and put it into a higher risk status post-project; and
- Nearly double the risk ratio in the Flat Creek watershed.

Proposed Objection Resolution Item #3: It is essential that the Stella project restore, rather than degrade, watershed conditions in the project area. We are counting on the Forest Service to address and avoid the negative aquatic impacts identified above by implementing the Stella project in manner that restores aquatic health and function rather than nearly doubling the aquatic risk ratios in watersheds of concern within the planning area.

Objection Point #4: Excessive Whole Tree Log Landings/Piles

The size of log piles and log landings associated with whole tree yarding on the High Cascades District is of concern to us. When large openings are created in the forest canopy and all vegetation is removed and soils are compacted in log landings utilized to facilitate whole tree yarding the impacted forestlands are in no way restored or more resilient than they were prior to the establishment of the landings. Additionally, when extremely large cull/activity slash piles are created (as occurred in the Big Pines project) it creates operational difficulty in burning or removing the material.

Proposed Objection Resolution Item #4: Please do not covert mature and late-successional forests into large landings and slash piles that are devoid of canopy cover and vegetation and in which soils are severely compacted.

Objection Point #5: Lack of Information Regarding Tethered/Winch-Assisted Yarding

The proposal to implement extensive tethered/winch assisted yarding on steep slopes throughout the project area as opposed to conducting skyline yarding appears to be based solely upon economic considerations. Page III-64 of the FEIS indicates that the timber industry enjoys the cost savings and increased profits associated with avoiding skyline logging but that the effects to soils from tethered logging systems are uncertain due to a lack of data and analysis. The National Forest Management Act (NFMA) prohibits the agency from selecting a yarding mechanism based solely on the economic preferences of timber purchasers.

Please note that page 25 of the Upper Rogue Watershed Analysis indicates that “[g]round –based yarding (tractors and one-end suspension) should be limited on clay-rich or wet soils. Full-suspension cable systems and helicopters are the preferred method of yarding on these soils.”

On page III-65 of the Stella FEIS the Forest Service states that the Stella Project “is focusing on allowing the potential use of tethered/winch-assisted harvest equipment on slopes greater than

35% if appropriate equipment and methods are available at the time of implementation.” This statement fails to inform the public or the decision maker about what project activities will in fact occur and what their impacts will be. Will tethered yarding occur? If so, where? On how many acres and what soil types? What qualifies as “appropriate equipment?” What does the reference to appropriate “methods” mean?

Proposed Objection Resolution Item #5: Prior to authorizing tethered/winch assisted harvesting activities please disclose to the decision maker and the public the locations and soil types where this activity will occur.

Objection Point #6: Significant Impacts to Spotted Owl Prey Species

We are concerned that page III-206 of the FEIS indicates that proposed thinning and canopy reduction within Northern spotted owl (NSO) critical habitat “can decrease some important owl prey species, such as northern flying squirrels and red tree voles, which appear to be especially susceptible to the loss of the mid-story canopy layer.” If this is the case, why not retain the mid-story canopy layer in forest stands located within NSO critical habitat?

Page III-212 of the FEIS states that “[r]emoving snags potentially used for denning by flying squirrels and nesting of secondary avian spotted owl prey species would reduce NSO foraging opportunities.” We again urge Forest Service planners to avoid actions (such as road construction and reconstruction) that will reduce this habitat element in late successional forest stands providing critical NSO habitat.

We are concerned with the agency’s approach to logging Red Tree Vole (RTV) habitat. We are unable to discern any non-monetary rationale for the agency’s decision to avoid implementing the survey and manage standards and guidelines of the NW Forest Plan to find and protect this NSO prey species. Is there a reason, other than convenience, for the reliance on the Red Tree Vole Conservation Plan as a surrogate for finding and protecting active RTV sites that are located within late-successional forests service as NSO critical habitat? Please note that the RTV Conservation Plan that the agency prefers to implementing the survey and manage protocols of the NW Forest Plan was never subject to NEPA analysis or public comment and has not been peer-reviewed. While the NW Forest Plan survey and manage program seeks to maintain occupied habitat for this NSO prey species, the Stella Project would lead to the logging of unsurveyed occupied RTV habitat consisting of late-successional forests located within NSO critical habitat. Such a result will not contribute to forest restoration objectives.

Proposed Objection Resolution Item #6: The restoration objectives of the Stella Landscape Restoration Project would be furthered by actions that retain and restore late-successional habitat for spotted owl prey species. Please avoid canopy removal and snag removal in late-successional forest stands that currently provide habitat for late-successional forest associated species and focus restoration activities on previously managed timber plantation stands.

Objection Point #7: Minimizing the Logging of Larger Trees

At S-5 of the FEIS the Forest Service indicates that Alternative 3 was designed in part to “minimize the cutting of larger trees” in comparison to the selected alternative (Alternative 2). We are unable to locate analysis within the FEIS that would inform the public or the decision maker about the different treatment of larger trees in the two action alternatives. Indeed, Tables III-75 and III-76 seem to indicate that *there no difference at all between the action alternatives in regards to large tree removal*. We believe that the stated purpose and need for the project would clearly be furthered by the retention, rather than removal, of large trees.

Page III-287 of the FEIS implies that the Forest Service seeks to avoid the establishment of large snags by logging large trees that are in the process of becoming snags. As disclosed throughout the FEIS, large snag creation is a desirable occurrence and the Forest Service should not seek to prevent the establishment of large snags in the project area. The FEIS fails disclose, analyze and implement the large tree retention measures that are contained in Alternative 3, while the action alternative selected in the DROD fails to maximize large-tree and late-successional forest retention.

Proposed Objection Resolution Item #7: Better meet the forest health restoration project objectives by selecting and implementing Alternative 3 to retain late-successional forests and large trees.

Objection Point #8: Logging of Native Forests Located in Riparian Reserves Undermines the Aquatic Conservation Strategy of the NW Forest Plan.

Please note that page 14 of the Upper Rogue Watershed Analysis indicates that “[a] total of 17,570 acres of the riparian reserves have been entered by timber harvests and would not meet the ACS guidelines. This is 28 percent of the total land in the riparian reserves.” To best meet the objectives of the Aquatic Conservation Strategy we suggest blending the riparian reserve management strategy of Alternatives 2 and 3 such that plantations in riparian reserves are thinned while native stands in this land use allocation are retained for the terrestrial and aquatic values. We are very concerned with the proposed skyline yarding corridors through native forests in riparian reserves and we are surprised that the DROD appears to allow for heavy equipment stream crossings. Where and how many such stream crossing will occur?

Please note that Table III-4 of the FEIS indicates that the Forest Service intends to conduct 3,992 acres of commercial logging within the riparian reserve land use allocation. By any measure this represents an extreme proposal that will result in significant adverse impacts. The location, number and impacts of yarding corridors and log landings needed to facilitate thousands of acres of riparian logging are not quantified or disclosed in the Stella timber sale FEIS. Yet page II-48 of the FEIS anticipates that the agency intends to establish numerous skid trails and 12’ wide skyline yarding corridors throughout native forests within the reserve land use allocation.

Page II-47 of the Stella FEIS acknowledges that logging the riparian reserves “should only be considered if needed to allow attainment of or to restore ACS objectives.” Felling trees in the primary shade zone of creeks in the project area, yarding across riparian features, cutting 12’

wide swaths through native forests to facilitate skyline yarding, and establishing skid trails throughout riparian reserves will not contribute to attainment of ACS objectives.

Page II-2 of the FEIS claims without reference to any data or site-specific analysis that “most” riparian reserves slated for logging would “benefit from treatments.” The term “most” is not quantified and the site-specific “need” to log riparian reserves is not established.

Please note that page III-31 of the FEIS acknowledges that “commercial harvest and density management are usually prohibited in Riparian Reserves...” Unfortunately the widespread riparian reserve logging (and yarding) proposed in the Stella project largely ignores this prohibition. The logging of thousands of acres of native forests, the unquantified establishment of skid trails and skyline corridors, and the removal of trees in the primary shade zone of streams and creeks throughout the project area undermines the intent and objective of the Aquatic Conservation Strategy of the NW Forest Plan.

Attached to this Objection is a July 2010 Memorandum prepared by the National Marine Fisheries Service that directly addresses the need to implement full NW Forest Plan riparian reserve protections in order to achieve the stream wood recruitment, shading and temperature objectives of the Aquatic Conservation Strategy. These findings are directly relevant the draft decision to log native forests located in the riparian reserve land use allocation throughout the Stella project area.

Lastly, please note that in recent RRSNF planning efforts such as the Slater Roadside Hazard Tree logging project the Forest Service has contended that trees and snags up to 175’ from roads could fall (or domino) onto Forest Service roads and infrastructure. If hazard trees can fall 175’ onto a road or a campground, then they can also fall 175’ into a stream. The agency cannot have it both ways. Please implement riparian buffers that are at least the width of roadside hazard tree logging sites in order to meet the stream wood recruitment goals of the NW Forest Plan and the Aquatic Conservation Strategy.

Proposed Objection Resolution Item #8: Meet the land management objectives for riparian reserves by combining the best elements of both action alternatives such that plantations in riparian reserves are thinned while native forest stands in this land use allocation are retained for their important terrestrial and aquatic values.

Objection Point #9: Significant Cumulative Impacts From Cattle Grazing Thwart the Project Restoration Objectives

Please note that page 20 of the Upper Rogue Watershed Analysis indicates that “[o]vergrazing of riparian areas can be witnessed throughout the watershed.” This is a significant and important cumulative impact that is not adequately analyzed or addressed in the Stella FEIS. While page III-96 acknowledges that past and current grazing activities are negatively impacting meadows, soils and aquatic values in Woodruff Creek and Flat Creek, the FEIS does not quantify those impacts or provide mechanisms for reducing the impacts.

Most Forest Service NEPA documents that we review acknowledge significant noxious weed spread associated with permitted cattle grazing. Hence, we were surprised that the Stella FEIS fails to analyze or disclose the contribution of extensive cattle grazing on the presence and spread of noxious weeds in the planning area.

Please note that several of the rare plant species analyzed in the FEIS (especially those associated with meadow or riparian habitats) are directly and cumulative harmed by ongoing cattle grazing.

Given that conservation of rare plants and aquatic resources are two of the stated needs of the project it is essential that the Stella FEIS analyze and reduce the cumulative impacts of cattle grazing on plant species of concern and aquatic resources.

We were surprised that the “range” analysis beginning on page III-279 of the FEIS analyzes the impacts of the Stella project on cattle grazing but not the direct, cumulative and significant impacts of cattle grazing on the project area. *The range analysis simply ignores the substantial impacts of cattle grazing on meadows, botany and aquatic resources that the Stella Project seeks to address.* If the meadow and riparian restoration objectives of the Stella Project are undermined by continued cattle grazing, then the purpose of the project is thwarted. Restoration cannot merely involve logging 87 mmbf of timber and building (and reconstructing) logging roads and log landings while cattle grazing is authorized and known to harm the meadows, riparian areas and botanical species of concern that the project is designed to restore.

Proposed Objection Resolution Item #9: Implement a comprehensive restoration project that acknowledges and reduces the significant impacts of ongoing grazing on meadows and riparian areas of concern in the Stella project area.

Objection Point #10: Neotropical Migratory Birds

We appreciate that the Forest Service acknowledges (on page III-268 of the FEIS) that:

Efforts should be made to reduce impacts to nesting birds that may be present in the project Area that may be directly impacted by underburning operations. Timing of operations should occur outside of the spring breeding/nesting season to the extent possible (May 15-July 15).

The avoidance of treatments during the nesting and breeding season is an extremely important consideration for our organizations. We agree with the Forest Service statement on page III-268 of the FEIS that “[d]isturbance operations and smoke is a concern for neotropical migratory birds.” We are also supportive of the utilization of prescribed fire and understand the constraints associated with burn windows. We are taking a leap of faith that the Forest Service will indeed be true to its word that burning during the spring breeding/nesting season will be avoided. It is essential that Forest Service project implementation live up to that trust.

Proposed Objection Resolution Item #10: Work with our organizations to implement and monitor project activities in such a way as to reduce impacts to nesting migratory birds.

Objection Point #11: Roadless Forest Values

We appreciate that the Forest Service recognizes (at page III-288 of the FEIS) that increasingly rare roadless wildlands “are valued by many of their very existence in an undeveloped state,” and that “[t]his value is experienced practically by users of the area and intrinsically by those who place value in simply knowing that undeveloped lands, perceived as wild, still exist.” Given this acknowledgement, we are very surprised and disappointed that the DROD appears to authorize the establishment and reestablishment of temporary logging roads within unroaded forest blocks. See Tables III-78 and III-79 of the FEIS. ***The vast majority of proposed project activities can proceed without the irreparable impact of road construction and reconstruction in the few remaining unroaded forest blocks in the planning area.*** The tradeoff of additional treatment is simply not worth the continued roading of nearly every corner of the planning area.

Our organizations do not object to proposed plantation thinning and the utilization of prescribed fire in roadless and unroaded forest stands. ***We are adamantly opposed to the proposed 400 acres of variable density thinning in unroaded native late-successional stands in the backcountry.*** The Forest Service and public stakeholders need to find zones of agreement and build trust around public lands management proposals. ***By authoring road construction and logging in the few remaining backcountry unroaded native forests in the project area the agency makes it much harder to achieve buy-in for large scale forest management projects.*** There is near universal agreement that plantation thinning, small-diameter thinning, and utilization of prescribed fire could occur on a large scale within the Stella Project Area. Why undermine that consensus by pushing the envelope through roading and logging some of the last remaining wild places in the High Cascades Ranger District?

Please note that while the Stella FEIS proposes road construction and re-establishment, variable density thinning of native forest stands, and special habitat restoration in unroaded forests, the exact location and effects of these activities are not analyzed or disclosed. Road construction, significant forest canopy reduction, and most forms of yarding are incompatible with the values that the Forest Service has acknowledged that many people find in the few remaining undisturbed forest blocks on public lands.

Page III-287 of the FEIS indicates that:

“Areas without roads often provide outstanding dispersed recreation opportunities, such as hiking, camping, picnicking, wildlife viewing, hunting, fishing and botanizing...These areas can also take pressure off heavily used wilderness areas by providing addition solitude, quiet and dispersed recreation opportunities.”

Given the values acknowledged above, our organizations are baffled by the agency’s refusal to protect unroaded forest character in the Stella project. Our organizations want the Stella project to be successful. We want plantations to be thinned and for prescribed fire to be reintroduced onto the landscape. But our concerns and values regarding increasingly rare unroaded forests are

just not reflected in the draft decision document which makes real collaboration much more difficult than it should be.

Proposed Objection Resolution Item #11: Please work with stakeholders to protect and enhance the values that many Americans find in unroaded semi-primitive forest stands by retaining native forest stands in these locations and avoiding construction of new logging road and log landings in these locations.

Objection Point #12: The Draft Record of Decision is Not Supported by a USFWS Biological Opinion

Our organizations are concerned that the Forest Service elected to sign a Draft Record of Decision (triggering an objection period over the holidays) prior to the completion of a Biological Opinion by the US Fish and Wildlife Service. The Stella timber sale would result in significant impacts to spotted owl prey species (including Red Tree Voles and Flying Squirrels), the removal of large trees from spotted owl critical habitat and the of downgrading hundreds of acres of Nesting, Roosting and Foraging habitat. In our view, these are not actions and impacts that qualify as “restoration.” By issuing a draft decision to implement the maximum logging alternative prior to completion of a Biological Opinion the Forest Service has put the cart before the horse. The Biological Opinion should inform the agency’s Record of Decision. It would seem to bias the decision process and the objection process to issue a draft decision document that does not consider or incorporate information contained in the Biological Opinion. It also furthers the appearance of bias and of the selection of an inevitable and inalterable maximum logging alternative. The purpose and efficacy of the public objection process is undermined and thwarted by the unavailability of the Biological Opinion.

Proposed Objection Resolution Item #12: Consider implementing some of the aspects of Alternative 3 that would reduce negative impacts to spotted owl habitat, spotted owl critical habitat and spotted owl prey species. In the future please implement a public NEPA and objection process such that the Biological Opinion is available to the public and the decision maker prior to issuance of a Draft ROD.

Conclusion

We support the forest resilience objectives of the Stella project and appreciate the proposed plantation thinning and prescribed fire treatments. We urge the Forest Service to avoid the negative impacts to soils, forests, wildlife and watersheds associated with extensive temporary road construction and reconstruction. We ask the Forest Service to limit the size and impacts of log landings and slash/log piles. Retaining, rather than removing large trees will aid achievement of the project purpose and need. The retention of unroaded forests that are not subject to road construction or logging and yarding activities is essential to the conservation objectives of the project. Please work with our organizations to focus riparian treatments in those areas where they

will do the most good, namely in existing timber plantations- while protecting native forests in riparian reserves from logging and yarding activities.

We hope that the Forest Service will substantively address our concerns regarding the Stella Project expressed in this objection and find zones of agreement that will result in a truly collaborative restoration effort.

Regards,



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