

Liz Berger  
Regional Forester  
U.S. Forest Service  
1220 SW 3rd Avenue  
Portland, OR 97204

January 17, 2024

Dear Ms. Berger:

~~We, the Board Members of the Oregon Dunes Responsible Management~~  
Corporation, a 501(c) (3) non profit organization, would like to comment on the scope of the U.S. Forest Service's proposal to amend the Northwest Forest Plan.

In the Federal Register Notice, you suggested that comments be focused in five interrelated topic areas. We would like to address our comments to your third category: "Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old growth ecosystems and supporting regional biodiversity"

The primary focus of the 1994 Northwest Forest Plan was on conserving the Northern Spotted Owl, mature and old-growth forests (primarily Doug fir and hemlock), and Pacific salmonids while still allowing some logging to support local communities.

As you indicate much has been learned and changed since the original plan and we would like to identify an issue not mentioned: the Coastal (also referred to as the Humboldt) marten (*Martes caurina humboltensis*) was listed as a threatened species by the U. S. Fish and Wildlife Service in October 2020.

We note in your federal register announcement that all units of the Siuslaw National Forest are within the area of the Northwest Forest Plan, including the Oregon Dunes National Recreation Area (ODNRA). In the ODNRA there is a very small, tenuous and vulnerable population of Coastal marten estimated to be about 70 individuals. Based on current research most of these marten in the ODNRA reside in older and mature stands of shore pine (*Pinus contorta*) habitat with a

dense understory of berry producing shrubs. Shore pine management was not adequately addressed in the 1994 Northwest Forest Plan.

We are concerned that there is not the proper management in the ODNRA to ensure the continued existence of the Coastal marten.

We are also concerned that the current management on the ODNRA seeks to keep many habitat areas at early stages of succession rather than promoting their movement toward mature stands of shore pine which could be suitable habitat for the Coastal marten and aid in their recovery.

Off Highway Vehicles are also a major threat to the Coastal marten because the USFS refuses to manage OHV's in compliance with the 1994 ODNRA Management Plan.

We think that these are both major issues that need to be dealt with in the update of the Northwest Forest Plan.

Thank you for considering our comments.

Sincerely,

Board Members

Oregon Dunes Responsible Management Corporation

1026 Lund, Lake Oswego, OR. 97034

Charlie Day

Randy Hargens

Dr. Ernie Manders

Larry Mangan

*The Oregon Dunes Responsible Management Corporation is a 501(c)(3) non-profit corporation that was developed to ensure the 1994 Oregon Dunes National Recreational Area (ODNRA) Management Plan is followed by the U.S Forest Service, the governing body of the ODNRA. Our efforts work to benefit the public and protect the ODNRA for multiple use while preserving the dunes.*

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4. The fourth of the year was a very wet one, with very much rain falling. The temperature was very low, and the wind was very strong. The crops were very wet, and the people were very poor.

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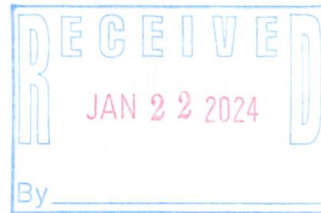
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