



Oregon

Tina Kotek, Governor

Department of Fish and Wildlife
North Coast Watershed District
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September 9, 2024

Michele Holman
District Ranger
c/o Chuck Fisher
Central Coast Ranger District
PO Box 400
Waldport, OR 97394-0400



RE: North Fork Smith Restoration Project #59122

Dear Ms. Holman,

The Oregon Department of Fish and Wildlife (Department) has reviewed the Draft Environmental Assessment (Draft EA) for the North Fork Smith Restoration Project, submitted by the U.S. Forest Service Central Coast Ranger District (USFS), dated August 9, 2024.

It is policy of the state of Oregon to manage fish and wildlife to prevent serious depletion of indigenous species and to provide the optimum recreational and aesthetic benefits for present and future generations of the citizens of this state (ORS 496.012). We support improving our nation's forests to provide high-quality fish and wildlife habitats. The Department provides the following comments and recommendations for consideration in the USFS review of their proposed project.

Terrestrial Habitat Restoration

- Early-seral vegetation habitats have declined significantly on USFS lands during the past 25 years since the implementation of the Northwest Forest Plan (Rowland et al. 2018). Due to the lack of early-seral habitats, elk forage quality and quantity are poor, and population densities have dropped on Siuslaw National Forest lands. The decline of this habitat, particularly on federal lands, is a limiting factor in sustaining viable ungulate populations. To improve forage resources and population densities of coastal ungulates such as Roosevelt elk and black-tailed deer, sufficiently recurrent disturbance management must be incorporated into long-term forest planning on federal lands (Sporting Conservation Council 2008). To increase and improve early-seral habitats, we recommend utilizing the Elk Nutrition and Habitat Use Models for Western Oregon (Westside Elk Habitat Model) to guide USFS forest harvest management actions to improve elk habitats (Rowland et al.

2018). These models, led by the USFS Pacific Northwest Research Station biologists and other collaborative researchers, have developed the tools to plan and improve elk habitats when designing and implementing landscape-scale projects such as the North Fork Smith proposal. We did not see any reference in the Draft EA to utilizing the Westside Elk Habitat Model for this proposed project. We recommend the USFS utilize the Elk Habitat Model for the North Fork Smith project to improve elk and wildlife habitats. We believe managing these early seral habitats will benefit a host of other species that also use or are dependent on these habitats (Hagar 2007, Swanson et al. 2014). We recommend creating more significant (>5 acres) forest openings (e.g., clear-cuts, a mosaic of early habitat with leave trees) and utilizing frequent burning techniques to improve soil, forage, and wildlife habitat. Clear-cut regeneration harvest has demonstrated superior forage nutrition production over commercial thinning (Wisdom et al. 2018).

- The Department supports the treatment (herbicide and/or manual) and removal of noxious weeds within the project area and across the Siuslaw National Forest.
- The Department supports the creation and enhancement of beaver habitat, but there is no mention of beaver habitat creation or enhancement in the Draft EA in the wildlife or aquatic sections. What is the USFS doing to improve beaver habitats specifically, not fish, hydrology, or ESA-listed species? We recommend a focused effort on beaver habitat creation and restoration (i.e., reed canary grass removal, blackberry removal, willow planting, etc.). Riparian areas currently open and planned to be replanted should be done so in a way that provides and mimics food and habitat for beavers, elk, and other herbivores, but also leaves areas with open early seral grass habitats (not planted with trees). This should be a long-term goal. Across the landscape, beaver food and habitat have been converted into dense riparian areas dominated by conifer species or noxious plants. Maintaining functional open grass meadow habitats along riparian areas and replanting with favorable native willow species on the streambanks for beaver food and dam building will directly benefit the District's goals of restoring terrestrial and aquatic habitat functions.
- We recommend that temporarily opened, stored, and decommissioned roads that are identified as closed in the USFS travel management plan be securely closed with gates/boulders so that motor vehicles are not able to go down them after being closed and/or stored. We have witnessed road violations along the central coast USFS area after similar projects. Bermed roads do not appear to be working on the central coast to keep trucks and other off-road vehicles from accessing closed/stored roads. Road closed signs are recommended to be used for your project to enforce compliance with USFS travel management rules. Violations of your travel management plan may occur after these projects if the roads are not secured and signed. Public access is becoming harder to find as private lands are going to permit systems or altogether shut down to public access. We recommend leaving the road prisms on these closed roads intact to allow single-track non-motorized public access. Completely obliterating the road prisms will reduce public

recreational access and opportunities for hunting/ fishing and other outdoor activities.

Aquatic Habitat Restoration

- The Department supports the plans to implement large wood structure sites within the project boundary waterways. This includes support for dropping overstocked plantation trees into project area streams.
- The Department supports the replacement, removal, and maintenance of culverts and drainage features along the district's road system to ensure proper runoff drainage and minimize sedimentation into waterways.
- The Department recommends careful consideration in the proposal to restore shade to riparian habitat along project waterways. Across the landscape, beaver food and habitat have been converted into dense riparian areas dominated by conifer species or noxious plants. We recommend leaving riparian grassy, early successional areas open for herbivore grazing. We recommend focusing efforts on beaver habitat with willow plantings with the goal of creating and maintaining early seral habitat and having a mosaic of landscape and habitat features, the exact design and species used to replant the riparian zones should consider strategies that benefit a multitude of species and eco engineers, such as beaver.

We appreciated the opportunity to comment on your project proposal and look forward to working together as partners to improve wildlife habitats and populations along the mid-coast. We also look forward to working with your staff on present and future on-the-ground projects. Please let us know if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Kirchner".

Jason Kirchner
District Wildlife Biologist
Newport Field Office

REFERENCES:

Hager, J. C. 2007. Wildlife species associated with non-coniferous vegetation in Pacific Northwest conifer forests: A review. *Forest Ecology and Management* 246: 108-122.

Swanson, M E., N. M. Studevant, J. L. Campbell, and D. C. Donato. 2014. Biological associates of early-seral pre-forest in the Pacific Northwest. *Forest Ecology and Management* 324:160–171.

Rowland, M.M., M. J. Wisdom, R. M. Nielson, J. G. Cook, R. C. Cook, and B. K. Johnson, B.K. 2018. Modeling elk nutrition and habitat use in western Oregon and Washington. *Wildlife Monographs*. 199:1-69

Sporting Conservation Council. 2008. Strengthening America's hunting heritage and wildlife conservation in the 21st century: challenges and opportunities. J. Nobile and M. D. Duda, editors. White House Conference on North American Wildlife Policy. Oct 1–3 2008, Washington, D.C., USA.

Wisdom, M. J., M. M. Rowland, R. M. Nielson, J. G. Cook, B. K. Johnson, J. M. Hafer, R. C. Cook, P. K. Coe, D. J. Vales, B. J. Naylor, and M. Vavra. 2018. Nutrition and habitat use models for elk management in western Oregon and Washington. Pages 50–62 in Rowland, et al 2018. Modeling elk nutrition and habitat use in western Oregon and Washington. *Wildlife Monographs* 199:1–69.