

Data Submitted (UTC 11): 8/15/2022 10:03:50 PM

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Organization: The Siskiyou Crest Coalition

Title: Facilitator

Comments: The Siskiyou Crest Coalition

c/o Liza Crosse

13617 Highway 238,

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RE: Slater Fire Reopen Project and Environmental Assessment #62020

August 15, 2022

The Siskiyou Crest Coalition is a 30-member coalition of property and business owners, and nonprofit representatives, all located within the Rogue River Watershed, primarily in the Applegate River Watershed. Our goals include stronger protections for public lands which support the greatest biodiversity. We also advocate for improved management of forests to foster that biodiversity, and to better prevent forest fires. Given the location of our homes and businesses, we are very aware of the Slater Fire and its impacts. We are very concerned about elements of the Slater Fire Reopen Project and Environmental Assessment.

General Comments:

To support habitat in the most biodiverse areas, we ask that you do not yard felled material in LSR forest, Special Wildlife Sites, Riparian Reserves or designated Backcountry Areas. We urge the Forest Service to cut only dead standing snags, no live trees should be felled in the Slater Fire area.

The Siskiyou Crest Coalition is very concerned about erosion and sedimentation resulting from logging. We urge you to consider a "fell and leave" alternative that limits tree yarding and soil disturbance. Once the snag is felled all public safety hazards have been mitigated.

Logging near Forest Service Roads:

With the goal of preserving large wood and diverse habitats, and given that Forest Service roads are already open in the Slater Fire area, we urge the Forest Service to reduce the arbitrary 200' hazard tree logging area adjacent to Forest Service roads. All roadside hazard treatments should be made on a site specific, case by case basis considering the actual hazards, striking distance and terrain considerations that should affect designation of true hazard trees. Only true hazard trees should be felled and mitigated. Previous treatments in the Biscuit Fire and other fires have been far less than the proposed 200' treatment area proposed and have provided safe public access to roads and recreation sites. The project will be heavily subsidized by taxpayer funds, this subsidy should require that only true safety hazards be mitigated and only roads with significant public benefit that are regularly used, are thru roads providing important access, or access to trailheads and other developed recreation sites should be treated for hazard mitigation. Taxpayer subsidized hazard tree removal should focus on treating roads with significant public benefit, not rarely utilized roads to nowhere.

The Environmental Assessment:

The EA must consider cumulative impacts including recently implemented roadside hazard logging and impacts on the natural regeneration process, native plant communities, soil resources, stream sedimentation, coho salmon habitat, northern spotted owl habitat, great gray owl habitat, riparian reserves and compliance with the Aquatic Conservation Strategy (ACS).

The Scoping Notice provides no guidance on treatment within the planning area and its various land use allocations. Treatments must be tailored to be consistent with Standards and Guidelines for LSR forest, Special

Wildlife Sites, Riparian Reserves, designated Backcountry Area.

The Siskiyou Crest Coalition has great concern regarding the long-term trend of public agencies minimizing public input regarding the management of public lands. As some of the Slater Fire's nearest neighbors, we seek your assurance that you will comply with NEPA requirements related to public input, especially as it relates to the Environmental Assessment, but also regarding your proposed treatments.

Thank you for your consideration. Please communicate with the Siskiyou Crest Coalition via the email address lizacrosse@comcast.net.

Sincerely,

Liza Crosse

On behalf of the Siskiyou Crest Coalition
(members' names available upon request).