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Organization: Save The Riders Dunes

Title: President

Comments: Forest Supervisor, Siuslaw National Forest

Attn: Objections

3200 SW Jefferson Way,

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Objection for EA and ON for Oregon Dunes Restoration Project #52946.

Dear Michele,

Please accept these comments filed by the STRD board of Directors. STRD appreciates the Forest Service allowing us involvement in this important project and feels confident that our concerns have been heard. As stated in previous objections, we believe this restoration plan is a good start. We agree with most of the methods of invasive species removal.

We think the decision to protect the Marten habitat over restoring more of the open sand is just plain wrong. We believe that encouraging growth of the vegetation (by not removing) will only hasten the demise of open sand. Allowing invasive scotch brooms to remain in Marten habitat will spread it faster. The open sand loss is approximately 10-20 acres a year now, that will only grow if we don't remove as much vegetation as possible now.

After listening to the Marten presentation at ODRC by Katie Morierty on 1/31/20, I left there feeling there is simply too many unknowns and assumptions built into the restoration plan concerning the Marten. There are 24 areas known to be inhabited by Martens outside the ODNRA. Katie stated how allusive the Martens are, she admitted they are rarely seen or photographed. My point being there may be more Martens in other areas not studied. In the ODRC meeting 2/15/19, Michele Jones stated "if the habitat is there then the Martens are there". Driving up 101 from Coos Bay to Florence, much of the habitat on the east side of the highway looks exactly like the habitat on the west side (in the ODNRA). There certainly are Martens living in non studied areas and private property adjacent to the ODNRA. It is possible the Martens exist in many more places than we know. It may be possible to remove the Martens from areas being considered for restoration in the ODNRA and place them in one of the other areas outside the OONRA they are living now.

The maps and corridors are based on the best studies we have available now. What if they overestimate the Marten habitat? What provisions are built in if the assumptions are wrong? We could be losing valuable time allowing more growth to occur where we could be restoring the open sand areas. What if a Corridor listed now isn't a true corridor, but the delay in time and how we chose to treat it proves to be insurmountable for restoration in the future, What If allowing more growth changes the habitat so that the Martens no longer want to live there? The 40% cover under 10" seems like just a guess. I realize the FS needs to include specifications for removal of vegetation. We don't know what effect this will have on the Marten but we do know what effect it will have on the vanishing open sand. Any restrictions to vegetation removal will quicken the loss of open sand. Allowing the Marten habitat to remain will increase the costs of removal in the future, larger denser forests will be more costly to remove than smaller forests now.

In Katie's presentation she stressed the Marten population in the ODNRA is very fragile. How are we going to know if the Marten Habitat protection is working? The Martens may be a temporary visitor to the ODNRA, once

the food supply is exhausted, maybe they will leave. Bobcats and other predators may find the martens and chase them away from the ODNRA. The changing habitat in the dunes may not be productive for them in the future. The studies cited in our previous objection indicate the survival prediction of the Martens is not good. Inbreeding, disease, tsunamis, breeding depression, and habitat change are just a few of the risks against them. There are so many natural forces that can cause their expiration in the ODNRA, why take the risk that we could lose the open dunes in the future because we tried to save the Marten? I would hate to think that a dog poop with parvo could be the demise of both the Marten and the open sand in the ODNRA. We don't want to see the Marten expire, but it seems like it could be moved out of the ODNRA or the habitat maps could be made less restrictive.

The Western snowy plover is on the endangered species list. The Pacific Marten is not listed and may never be listed. One of the items the marten eats are birds. According to Katie she doesn't believe the Martens presently eats snowy plover. What happens if we allow the marten's habitat to expand closer to the snowy plovers habitat? What if the martens discover the plovers and start eating snowy plover eggs and birds? Seems like one endangered species could be threatened by a species that historically did not inhabit the Dunes. We could have a real trifecta here- Save the Marten habitat, lose the snowy plover, lose the Dunes, and in the end lose the martens anyway. Why take the risk?

Katie stated that the Martens coexist with OHV's in the open riding areas within the ODNRA. She said there was no evidence that OHV impact the martens. Presently there are no plans to alter OHV access or riding areas due to the Martin habitat. We agree with this assessment and hope it does not change.

Landscape restoration is not being considered in this EA. The area south of Winchester bay riding area from Hall Lake to the ocean seems like an excellent place to try Landscape restoration. If the foredune was removed it would not affect the riding area and snowy plover habitat could expand. The deflation plain is thick, but not as vegetated as areas farther south in the Dellenback area. There is some marten habitat but mainly in Tree Islands that wouldn't be restored anyway. We urge you to reconsider this area for Landscape restoration.

We are very pleased that the Forest Service is making plans to restore part of the ODNRA. We know this takes a lot of hard work. there are many conflicting issues and regulations to consider. We realize this is not easy. As riders it is simple: we just want more open sand and no new restrictions on the riding areas. We are also willing to help restore the Dunes and will assist the Forest Service whenever possible. We feel somewhat disappointed that the discovery of the Martens in habitat that mostly didn't exist 40 years ago could severely impact the recovery efforts now. We feel that decisions made here today will be questioned 40 years from now. We hope it won't sound like this: "They really had a chance back in 2020 to restore the dunes, now it's too late."

Leo Cox
President STRD