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Organization:
Title:
Comments: Oregon Dunes Restoration Project
U.S. Forest Service, Siuslaw National Forest
Central Coast Ranger District - Oregon Dunes National Recreation Area
Michele H. Jones, District Ranger, Responsible Official

To Forest Supervisor:

I submitted scoping comments to the Proposed Action and comments to the Draft Environmental Assessment including maps and photos dated May 30, 2019 along with a follow-up letter dated September 5, 2019 and email dated September 17, 2019.

In my comments to the Draft EA, I suggested several additional areas should be included for invasive plant treatment, however, none were included in the final EA except unit 2.2. In response to my comments (BB-6, page 11 of Appendix B), it states, "In unit 2.2, weeds outside the unit can be treated manually." From this, I am assuming that the gorse plants that are to the south of Sutton Creek and east of the southeastern boundary of unit 2.2 can be removed manually without further NEPA analysis? The problem with not including these areas within the unit boundary is I am assuming herbicide treatment on the cut stump of the plants will not be allowed? If this is the case, then I object to the unit boundary being where it is currently. It is much more efficient and less labor intensive to apply herbicide to the stump of the plant rather than digging up the rootball. Gorse starts sprouting from the roots within two weeks of when the plant is cut down, so the rootball has to be dug up if you want to kill the plant. Also, there will be less ground disturbance applying herbicide versus digging up the rootball which I think is important adjacent to Sutton Creek. Gorse seed is dispersed by water. Without an option for herbicide treatment in the floodplain upstream of Unit 2.2, it is likely any gorse treatment there will be a low priority due to the cost and effectiveness of manual treatment alone and new seed produced there will continue to be a source of infestation downstream in Unit 2.2. The vegetation and vegetation density is the same or similar both outside and within unit 2.2, so I do not understand why these areas were not included. To resolve this objection, the southern boundary should be extended to the south of Sutton Creek and the southeastern boundary should be extended to the east to include existing gorse plants. Native vegetation in these areas can be left for marten and salmon habitat.

In response to my comments (BB-7, page 11 of Appendix B) where I suggested unit 1.4 be extended to the north and south of the unit along Sutton Creek North Trail to remove gorse plants, it states "Gorse treatments can move forward." From this I am assuming that the gorse can be removed manually in these areas without further NEPA analysis? Again, I assume herbicide treatment of the stump cannot take place. If that is the case, I object to the current unit boundary, and the resolution would be to extend the boundary to the north and south along Sutton Creek North Trail for the rationale stated in the previous paragraph regarding manual control alone being less effective and more costly. Native vegetation in these areas would not be removed.
I had a variety of suggestions about unit 3 but none were followed. I have reviewed a lot of the ground in and around unit 3 over the last 5 years, mapping and removing gorse and Scotch broom. Almost always if you can see open sand on the aerial photo, there will be Scotch broom or gorse along the edge of the tree line. Most often there is enough native vegetation in the area that removal of invasive plants would not affect marten habitat. I have included an example of an area to the west of unit 3 where Scotch broom has been removed by a volunteer work party. Before and after photos are included in Figure 1. Note the native grasses in the photos. To resolve this objection, the areas of sand trails to the north and west of unit 3 should be included for treatment.

Native vegetation could be left.

The area to the south of the unit 3 label has been omitted from treatment. Scotch broom and gorse have been removed from this area in the past by volunteers and youth crews and it will likely return from seed. Since gorse and Scotch broom seed remains viable for 50 years or more, these areas will continue to need to be monitored and small plants removed as they come up. For example, I removed three small gorse plants on the BLM portion of this area in the last few weeks. The area in the northeast portion of the omitted area is wetland with pine overstory, scattered mature gorse plants, and sedge. There are no ericaceous shrubs. I don't believe this is marten habitat, at least what I have read in the literature does not indicate this is marten habitat. I believe the gorse in this area should be removed. See Map 1 - blue highlighted area for wetland and gorse location and Figures 2 and 3, blue arrows indicate gorse plants in the background in the wetland. South of the wetland, I agree the area is marten habitat, but I believe mature gorse and Scotch broom plants could be removed while still meeting PDC 806. See Map 1 - orange highlighted area for locations of these populations and Figure 4.

East of the wetland and the marten habitat to the south, there is an area that has been mapped as marten habitat. It is centered on a sand trail that runs to the north - south. The sand trail is open sand and I believe only a small portion of the stand of trees to the east is actually marten habitat. See Figure 5 and Map 2. There are a large number of mature gorse plants along the edge of the wetland and along the sand trail. See Figure 3. Wouldn't it be more accurate to map the marten habitat to the west of the sand trail and south of the wetland? This will allow more gorse to be removed since PDC 806 would not have to be followed. There are additional sand trails and open sand that has been mapped as marten habitat. These areas are used for hiking and I doubt that they will become marten habitat in the foreseeable future. See Map 2. To resolve this objection, include the omitted area of Unit 3 to the southern BLM boundary with the stipulation that only invasive plants will be removed and adjust the marten habitat to more accurately represent what is truly marten habitat.

I believe there are many areas in unit 3 where European beach grass could be treated with prescribed fire in combination with other methods to increase treatment effectiveness and efficiency. The volume of beachgrass biomass could be lowered and what re-sprouted could then be treated with herbicide. This would greatly reduce the amount herbicide needed to treat the beachgrass due to volume of re-sprouts being sprayed versus full-size plants. The use of prescribed fire post-herbicide treatment can also accelerate sand movement and reduce the likelihood of invasive plants re-establishment by removing dead beachgrass litter. Early-on in the EA process, I thought this was discussed as a preferred method of treating the beachgrass. I thought many of the upland areas away from the foredune would be treated in this way. That is why I commented that the PDC for prescribed fire was too restrictive in its timeframe and prescribed fire in these upland areas would not affect snowy plovers (BB-19, page 14 of Appendix B). I was surprised when I saw broadcast burn was only being proposed for foredune areas in the tables in the EA. These tables did not exist in the Draft EA. If they had, I would have commented on this at that time. If there is mechanical treatment in an area, then pile burning makes sense. But if there is no mechanical treatment, making piles to burn is going to be labor intensive and would not be possible for beachgrass. It seems like using prescribed fire where beachgrass is surrounded by sand would be a cost-effective treatment. I realize it will be difficult to get the burning window for a lot of these areas all at once, but it seems like you would want to include them in the EA, so that prescribed fire could be used as the burning window presented itself over time.

Other areas in the Baker Beach area where mechanical treatment is not proposed, there is not marten habitat, and where prescribed fire could be used to treat European beachgrass include units 1.4, 1.7, and 5. I didn't include units I. I, 1.8, and 1.9 in this list due to the proximity of Highway 101. In the Cleowox area, units 31, 36.1, the area south of 36.1, and 36.2 could use prescribed fire. In unit 31, the area around the RAWS station at South Jetty Campground, the area to the north of the RAWS station, and the South Jetty foredune (away from the riding area) have all been treated for broom with prescribed fire in the past, so I am not sure why they can't be treated with prescribed fire now. I didn't include unit 36.3 due to the proximity of Highway 101. The following units could

also use prescribed fire with the same conditions as stated above: units 15.1, 33, 51, 17, 21 20.2, 24, 50, 26, 28, and 29.
I assume PDC #401 applies to pile burning as well as broadcast burning foredune areas since it says," ... prescribed burning operations ... "? If that is the case, I object to this. PDC #401 should only apply to burning the foredune areas. Pile burning or prescribed burning described above in areas away from snowy plover nesting areas can easily take place within the nesting season without disturbing or harming the plovers. To resolve this objection, a qualitative statement could be used as a PDC like, prescribed fire will be accomplished when wind conditions are such that smoke does not impact snowy plover areas, campgrounds, picnic areas, etc. The response to my comments on the draft EA (BB-19, page 14 of Appendix B) states, "Burning could be allowed where we can make the case that smoke will not negatively affect nesting snowy plover or Pacific marten (See Project Design Criteria, page 25, Final EA)." However, I did not find any statement similar to this in the Project Design Criteria section.

I recommended the boundary of unit 36 follow the administrative boundary of the Forest instead of the riding area boundary. The response to the comment was "Some areas have been left out to discourage OHV use and promote a sound barrier (BB-3, page 10 of Appendix B)." The boundary of the riding area is signed and there is open sand between the riding area and the Scotch broom that should be treated. I agree that removing the Scotch broom will create more open sand, but I don't see how that will increase the number of violations of the riding area boundary. Most people will follow the rules and the signs and a small number of people will violate the signs. This will occur regardless of treatment or not. If you don't treat the Scotch broom, it will continue to spread and take over the open sand. I think it would be better to treat the area now, before the Scotch broom spreads even more. To resolve this objection, include the area between unit 36 and 36.1 for Scotch broom removal.

I commented that unit 31 should be extended to include the South Jetty foredune so some foredune leveling and prescribed fire could be used. The response to the comment was "The project does not propose foredune restoration in riding areas to protect WSP (BB-13, page 12 of Appendix B)." The riding area is closed going north where the South Jetty Road turns to the north. There are many miles of foredune that could be treated while leaving a reasonable buffer between the riding area and treatment areas. A treatment area could be surveyed for snowy plovers or treatment could take place outside of plover nesting season. To resolve the objection, create unit 31.1 along the foredune at a distance to the north of the riding area so there is a reasonable buffer between the riding area and potential snowy plover nesting habitat. Again, this area was treated with prescribed fire in the 1990s and early 2000s, I am not sure why you wouldn't want to implement this treatment now.

I suggested the following areas could be treated for Scotch broom and if they are marten habitat, they could be treated to the level prescribed by PDC 806 and other PDCs: along the sand road from Waxmyrtle Campground to the beach, the area north and west of Chief Tsiltcoos Trail and east of Driftwood II Campground, and the Horsfall and Siltcoos Road corridors. The response to the comment was "Treatment in deflation plains are not part of this project (BB-9, page 11 of Appendix B ). " Most of these areas are to the east of what I think of as a deflation plane. Many of these areas are thick with Scotch broom, and I believe treatment should begin in these areas. Removing the invasive plants to 40% canopy cover is much better than no treatment at all. It will be beneficial to start removing mature invasive plants so the existing native vegetation can begin to recover. To resolve this objection, include these areas for treatment.

I sent an email to Michele on September 17 suggesting a treatment be considered south of the Umpqua #3 Staging Area where the vegetation could be removed between the beach and the inland sand, allowing for one area where goal #3, Restore Landscape Scale Natural Processes, could be implemented. I understood from her letter in response, she would ask the IDT to consider this suggestion. In the Response to Comments, there was no mention of this area. In response to another one of my comments, it was stated, "We are not intending to

create WSP habitat in riding areas (BB-16, page 13 of Appendix B)." However, in the area south of Umpqua #3 staging area, there is a fence and signs east of the beach that state riding beyond this point is not allowed, and riding on the beach is also not allowed. So western snowy plovers would still be protected even if the vegetation is removed. Since there was no response specific to this area, I sent an email to Chuck Fisher, IDT leader, on February 5th asking if it had been considered. He forwarded my question to Cindy Bums and Armand Rebischke, but to date I have not received a response. Was it considered, and if so, what were the results? Perhaps the vegetation is considered marten habitat even though there is no pine overstory?

I know Annand has a number of stewardship contracts that he would like to advertise and are dependent on the Decision Notice being signed. I certainly would like to see these contracts implemented as well. In another email I asked Chuck, if there were areas added for treatment like I have proposed in my comments and objection letter, would it have to go back to USFWS for conferencing. He responded that it probably would if it was within marten habitat. I propose that the decision notice for the areas covered in the EA and recommended changes that would not require additional conferencing should be signed. The additional treatment areas that I am suggesting that would require conferencing could go to USFWS if necessary, and a new decision notice or an amendment to the first decision notice be written after conferencing was completed. In this way, the contracts will not be delayed.

I will be out of town from March 10 to 17 and have appointments on the 18th and morning of the 19th I could speak with you regarding these objections on March 6 or 9 or could meet with you to resolve these objections following the 19th.

Respectfully,

Bill Blackwell