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First name: George

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Organization:

Title:

Comments: Please modify the Shasta Agness Project

Dear Shasta Agness Objections,

I am an ecologist who specializes in forest ecology. I would argue that chainsaws are an entirely new "evolutionary" factor for forests. If forests need "restoration" let natural processes like insects, disease, wildfire, etc. do the "restoration. A forester with a paint gun has no idea what genetic adaptations any particular tree might have, and logging can reduce forest resilience to future stressors.

I am shocked by your draft decision to log 2,199 acres of Late Successional/Old Growth Reserve Lands (LSR) under the guise of "oak restoration." Anyone who is familiar with the mature/old growth forests such as those adjacent to Oak Flat road can plainly see these forests are no place for unit wide thinning of trees up to 28" in diameter. In this area, no oaks exist on at least 95% of the forested landscape.

I do support the treatment of 1,635 acres of plantations. The NFP clearly states that plantations within LSR designations are the priority for management and not older forests that harbor at-risk wildlife. I agree there are some oak restoration units that would benefit from logging on southern exposures on poor soils in the Shasta Creek watershed (such as unit 72) however, the units along Oak Flat road are clearly in no need of unit wide thinning. I recommend that you drop unit wide commercial thinning in Oak Restoration units 8, 9, 10, 54, 73, 74, 75, 76, 78, and 79. Radial treatment around existing oaks >8" DBH would be appropriate in these units. All treatments within a mile of Humboldt marten and Northern Spotted Owl sightings must be dropped since the treatments would likely harm these animals contrary to Northwest Forest Plan (NFP) directives. The Draft Decision fails to demonstrate significant benefit from treatments in pine habitats that would offset possible significant adverse impacts to Humboldt marten, Northern Spotted Owl, or red tree voles.

Mature/old growth forests stands such as this one in oak restoration unit 78 is no place for unit wide thinning of trees up to 28"DBH where there are no oaks to restore. Let's work together to implement real restoration rather than cutting corners and ignoring Forest Plan protections for this LSR.

Thank you for incorporating my concerns into your project planning effort.

Sincerely,

Mr. George Wuerthner