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Comments: TEP-CSB-1

Marys Peak

Jan 31, 2022 Alt 3C. Marys Peak response in protest period under 36CFR218.5 objection.

[ldquo]To begin site preparation, heavy machinery would be used to level the construction work area and excavate areas for footings and foundations. In some areas, a layer of rock or soil would be laid down prior to pouring concrete foundations for some equipment and structures. A stormwater retention system would be needed for all alternatives because the total disturbance area would be greater than 5,000 square feet.[rdquo]

ACOE permit hopefully will be thoughtfully considered and not be a rapid no site visit remote sign off and use of a Nationwide fill permit for this highly sensitive area which receives the worst weather, highest winds, ice and snow, and lowest temperatures and has endemic grasshopper, insect and possibly ant species and sensitive rare botany.

Can site inside fence at top be flagged out for grading, to not have the entire 5000 square foot site inside fence entirely leveled? The site has not been leveled possibly recently, so is not level for possibly good reasons not defined in this EA.

Recent or prehistoric cultural materials may be in areas which are not leveled currently at the top.

Current construction site was limited to smaller areas in the past, and mass grading never occurred here at that time of building construction, so site is not level currently. Site contains original micro topography which should be retained as habitat refugia areas for plants and insects. Will leveling 5000 square feet of the top have negative impacts to the top such as weed invasion into this very large area of disturbance?

Will uneven topography be restored here after the project is done? Is this site lidar mapped to show topography, and how it should be restored if 5000 square feet of the top will be graded down to x feet and rocked?

Uneven topography may be very important to area wildlife, birds and insects here at the top with 100 mph winds, driving sideways snow and high volumes of rain, these micro topographic areas provide direct shelter and shielding so that those who live here, year round, will not be blown off the top. Shade is created by changes in topography and so soil moisture is retained at the top with the topography varying and not being all one level. Soil moisture may become dryer here due to top being leveled gravelled and baked in the sun.

Fire danger will increase here at the top with area leveling and weed invasion if weeds are not controlled. It takes 3-5 years to establish native plants and at this location, possibly longer due to the extreme environment these plants have to exist in. Soil compaction inside the fence from heavy equipment will cause the soil to need

to have some attempt at uncompacting it, if that is even possible since there is possibly no such thing as restoring compacted soils. Soils unique only to this area may remain compacted and be hard to mitigate. Adding current site's micro topographic changes back to this area, may be important in restoration efforts for this site.

Can the top be revegetated fast enough over 5000 square feet to keep it from converting to weeds?

Who keeps on paying for this work after five years if the top is not restored correctly by BPA? The USFS will after five years, have to start to pay for this work, and need to hire a second Suislaw NF Botanist so this work can occur without delay. This area is rare botanically, and paired with unknown impacts from Global warming, restoration of the top could be even harder as the EA states.

The less area impacted by construction the better for restoration efforts here.

Detention facility: Digging water retention engineering structures on the ground here at the top should be closely evaluated by certified anthropologist. Water retention ponds may be a useful thing to keep and retain at the top, after the project is done to allow for water feature here for area insects, birds, bats, mammals, lizards, cats, or snakes. Eventually over time the detention swales will fill up with soil and rock due to frost soil and rock heave, water and wind erosion, moles or gophers excavation or plant use.

1000 of native Marys Peak only plants inside fenced area are currently doing very well due to possibly lower impacts from human visitors. Soil compaction is limited to parking lot drive way areas. Plants are able to flower and seed without impact by foot traffic.

Seed can be collected or plants could be dug and moved from the mass grading area, if this was not already done in 2021, if this entire site will be mass graded. Topographic variability here may be an ecologic important factor to keep plants and insects warm in high wind and white out snow conditions. Temperatures drop quickly here with wind chill adding to area impacts. Any chance to shield from the wind next to small hillside and rises at the top here is very important for area insects, birds, mammals and plants.

Leveling off the top may cause issues with high winds increasing in speed and ripping up more equipment here due to level plain and gravel fill at the top.

Plant Salvage at the top:

Volunteers may enjoy digging up and moving plants here for the 2022 work. This is a job of a life time to offer to try to salvage this many plants from a marked out grading area, at the very top of Marys Peak.

I assume people would be very interested in helping dig and move native plants from inside the fence to outside the fence, if the project does not fund salvage workers.

Rock garden area is rocky, the top is rocky with imported gravel, so interior of fence area with gravel may mimic the rock garden at the top, for the top's gravel fill pad substrate.

Keeping gravel area gravel after construction possibly to allow plants to establish similar to rock garden area?

Can construction of towers be done outside fence and parts be taken inside fence to put together, to limit larger grading and leveling inside fence area? Can a crane be used to put together smaller parts of the new tower so that less of the interior area needs to be leveled? Can fence be removed and work access roads be build to allow equipment to take parts put together in the outside drive way area be taken into the fence area on new access roads, so that the entire site does not have to be mass graded? Then restore the fence and leave the access roads, to see what nature does to these roads from the north side? Does the selected 3C provide alternatives for mass grading for safety in construction? Can a crane do work from outside and lift the put together parts of the tower equipment to the inside of the fence work site, so that 5000 square feet inside does not need to be mass graded?

31-40 Plant salvage

For removing 229 linear feet of fence, could the fence be kept in place, to allow this area to be a seed, plant grow out area to move plants from here out to mitigate heavy use areas at the top, or to repair trail erosion using native plants at the top? Can Alt3C consider use this area as a teaching location, to share how restoration is done at this site, from inside this fence? Fence will keep x number of visitors out over time, and plants and endemic insects may be able to use this area with less disturbance.

Bird species may use fence line to hunt and perch to sun themselves away from people. If 229 linear feet of fence is kept, 100 feet of North South fencing does not need to be constructed or graded for construction of 100 feet of level fencing.

Instead of growing restoration Marys Peak plants out in the WV in pots in greenhouses, and hauling them back up to the top, use the existing fenced in area as a grow out area, specific for the harsh conditions these plants survive under. Direct grow out at the top, inside the 229 linear foot fence area could will provide ongoing facts and details about the needs of these plants at this site, to USFS Botanist and contractors and result in more discoveries which would be lost in growing plants out in the WV in greenhouses.

Direct grow out at the top, and transplantation of plants at the top, from the top, may work well. EA comments notes future problems with plants establishing in restoration from work sites, due to impacts from Climate change.

Climate change was hopefully addressed in the EA evaluation, for use of the top elevation of this peak, for human use, and to work with nature as it is forced to respond to climate change created by man. Adding more direct impacts here from newer radio and microwave technology may not be addressed in the EA. 40CFR 1508.27 Intensity impacts. Will project impact any bird nesting at the top, from total removal of all vegetation and leveling of 5000 square feet of area? Work area at the top of Marys Peak may continue to degrade from this large impacted area, and be very difficult to restore over a short period of time it will take for weeds to invade and establish.

Collateral damage to area year round bird species, snake, mammal, lizard, gopher, mole, bees species, migratory birds, bats, nighthawks, endemic insects and area wildlife from new and higher frequency equipment and microwave antenna, five G antenna/transmitters and receiver technology, should be spelled out in the EA. Damage to natural systems from man made technology is degrading the earth in general world wide. Human health warnings should be clearly posted here from the use of these silent but invasive technologies for x number of area visitors coming here from around the world.

Safety and Health Hazard Signs warning of site dangers will get damaged, but it is worth a try, to possibly place signs inside the fence area to reduce vandalism.

Restoration of the top from human use in the very near future will need to occur when this technology no longer needs to be used at this location.

31-54 Thank you for employing a site monitor. Will this person have some say in stopping work and getting confirmation of what is going on in real time, with planning staff, if private contractor is in a rush to get stuff/work done? Will the contractor be required to listen to monitor in oversight of work being done, and be willing to stop work, so monitor can do their job, to verify and confirm if the work is going correctly to protect area natural assets, some of which are rare and not easy to replace in a short period of time?

Grading of the road water bar, at the top should possibly be considered to be done by hand to reduce the amount of weedy edge materials that fall downhill into the Botanic Significant Rock Garden on both sides of the road here. Fir Tree at the top should be fenced so that it will not be hit, driven into or pushed over for this project. Area botany at the top, down along the road edges here should be marked out so that hopefully these areas of native plants will not be driven over, pushed over the edge for water baring or smashed or filled over with road rock.

Will the road bar and drainage leveling and fill be also monitored? If a contracted construction person is in a rush to complete the entire roadway water bar and grading in a day, they will resort to standard push materials over the edge all the way to the top, moving road bed around and spread weedy edge upslope or pushing weedy edge materials out across possible larger and larger areas in this road corridor to the top.

Should water bar road grading contractor be on site with the USFS Road Engineer who is familiar with this road, to fill in or brief the hired road grading contractor, before road grading occurs? Will the road grading contractor be in a rush to get this job done, and finish the entire reach of access road in one day? Should more care and time, be specifically placed on road grading and water baring, to not repeat what occurred in the past work to water bar construction in the access road to the top?

Will trenching ground boring, ditch witch use for power supply

directly impact subsurface prehistoric resources not seen in ground radar survey evaluations if the boring goes deeper than the radar survey went?

Can electrical conduit be left at ground level, at the top, to not have to use bore, trench, ditch witch cable boring at the top to conserve and protect this large prehistoric cultural site?

With upgrade of site at the top, to newer technology, will newer regulatory health warning signs need to be installed to let the public know how the site impacts their health? EMF, five g pollution, radio frequencies used,

microwave in use at this location and at what direction are these signals going, and to stay away from these signal corridors. Do not put picnic tables in these corridors as they are currently, possibly directly in the signal corridor.

Do not stand in this location signs, can be placed, to limit impacts from microwave signals, five g signals, radio frequency signals could be considered possibly by law to be installed here.

If the technology upgrade to be installed at the top becomes outdated and different improved technology is developed, to not need to use this highest point in the Coast Range, will the peak be rehabilitated back to having no modern human impacts under NRHP? Marys Peak and West Point Spur are Culturally significant to Native People hopefully all area Tribes where involved in the NRHP determination, and in any future pending decommissioning of everything from the top of Marys Peak.

Before construction starts, can a Tribal representative bless the site to honor the top site for how significant it is to First People? Since Alt3C will impact the top of Marys Peak.

31-14 Alt 3C cut 14 trees in BLM holding. Leave boles standing to increase habitat, or cut boles and leave part standing to increase habitat. Use log parts as water bars in this area. Leave logs on the ground for thatch ants to use, or other area insects and animals to use over time. Leave trees standing to block wind and reduce sound pollution moving out into the lower parking lot from the top equipment installation area.

31-16 Contractors should have directions for use of herbicide or pesticide at the top and lower parking lot area. Contractors not associated with the project may be hired to maintain buildings and equipment after five years, and will end up spraying around buildings possibly due to zero instructions at the site, for on site care BMP. BMP may need to be posted at this top site, so when years go by, the same practices occur, because they are listed at the site in both Spanish and English and or there is a posted telephone number to call to ask about spraying at the top.

Use of herbicide at the top could result in spray drift and impacts to endemic insects such as Marys Peak grasshopper and

blue butterfly found here, bees, ants, ground insects, beetles, mice, snakes, lizards, birds, bats, and plants such as Lupine albicalis here.

31-57 BPA weed control contractor will spray, spray could drift and the wrong species may be targeted, hopefully oversite will be available for this type of spray use work and USFS Botanist will oversee BPA weed control contracted work for five years.

Contractors often appear to just spray whatever they assume is the target, and hopefully they will confirm with knowledgeable staff to what species they will be targeting and where not to go to spray.

Spray use leads to the need to mitigate inside spray area, if these areas are large, to not have aggressive

weeds such as oxeye daisy or other valley floor weeds that are here, invade into the blank spray areas.

Will mitigation seed or plant materials get transplanted or seeded into large spray areas by team's Botanist for USFS, after BPA's five years of contract spraying ends?

Hire Matt Smith to be Botanist on site, as he has working knowledge of vegetation here.

Mr. Zak Weinstien also has a rare complete understanding of this area's botany from working on documenting and surveying over the years in the logging damaged areas in Bunch grass Ridge and the Parker Creek watershed headwaters.

31-17 Tree removal BLM. 31-17 tree removal caused weed invasion. Hopefully all equipment that will be used will be clean, as no logging equipment but chain saw will be used for this tree removal.

Storage of equipment in the lower asphalt parking lot may be able to physically collect area weed seed as it is blown into the equipment from the lower parking lot asphalt surface edge.

Blowing weed seed in the lower parking lot could get stuck or embedded in the equipment and tracked up to the top to drop off on the way up or

fall off while equipment is at work at the top.

Equipment should be cleaned and left on site for duration of project, not taken off and then put back on site with need to re-clean equipment each time. Trucks coming and going to the top may bring in all sorts of seed from their work on the Valley floor.

False brome is along the side of the access road, shiny geranium also is in this roadside area perhaps and able to spread anywhere and is costly to control if it is ever controlled by herbicide only application. Can clean trucks left at the bottom be kept on site, to keep weed trafficking to the top reduced? Or ask that contractors clean vehicles before coming to work at Marys Peak, out of an abundance of caution.

Require contractors use clean trucks which are kept on site and do not go down the peak, or all over the Valley floor and then up to the top 5 days a week for x months. Contractors rigs, could be cleaned in some area set up in the lower parking lot, prior to going to the top possibly but cleaning equipment here, will drop this much weed seed at the lower parking lot area.

Mark out highly valuable populations of Bear Grass to not have trucks parking on top of this area, if they could, or pass each other at this exact location and crush some of this grass nearest the access road. The Botanical Significant Rock Garden area road bed is heavily impacted by visitors, and parking trucks here up against the Rock Garden may add further compaction to the road bed and native plants in this edge area next to the Rock Garden. Parking trucks on the side of the road at the top, may add even more weed seed to this side of the

peak, perhaps as people get in and out of dirty trucks. Possibly try to flag off the plants in the roadbed edge, to try to conserve them from damage for this project.

Place a fire water tender or fire water container with long hose and buckets and shovels, fire extinguishers, fire tools at the top.

31- 39 Rice wattle use, will rich wattle have rice seed that could grow here?

Coringia orentailis needs to be evaluated against native wall flower, at the top, in season. Non native wall flower is in this area, at the top, and both species may have similar growth periods.

31-59 Fire History Of Marys Peak do area trees show fire scaring, or bole damage interiorly in age rings from fire? Does area soil pit profile at the top, possibly

show carbon deposits to confirm or verify there was fire here in x century?

Consultation to Native American records or pre settlement records from area fur trade diaries. Inquire to Dr. Bob Zybach for information on this coast range area fire history.

Did anyone from USFS look at cut trees for ring age indication of fire in the upper portions of the peak? Can remaining upper meadow logs and Noble Fir stump rings be looked at to see if they do show any fire evidence and to what year?

A fire silviculturalist can pick out these fires from ring evaluations. Can wind damaged Noble Fir be cut to look for fire scaring inside boles, to establish fire history and specific fire occurrence dates here? Fire may be a part of this area which is going unevaluated in this EA. With climate change, possibly natural fires may be able to return to this area or fire could be used as a landscape management tool in the Coast Range. Fire may need to be used in the peak area, to control weed invasion if other weed management resources fail and weeds continue to spread into the Botanic rock garden area from highly degraded, weed infested unmanaged private or USFS properties in the area.

Thanks, Rana Foster