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First name: Tom

Last name: Hawkins

Organization: Curry Citizens for Public Land Access

Title: Chair

Comments: Dear Sir or Madam,

Curry Citizens for Public Land Access provides the following comments for the Northwest Forest Plan Amendment, Draft Environmental Impact Statement, November 2024. The purpose of our group is to ensure the protection of access to public lands, by all forms of both motorized and non-motorized means, for recreation and other uses. Our membership represents a very broad and diverse group with varied interests, but we come together in our quest to maintain access to public land for current and future generations.

Comments

The scoping period should be extended until after the Forest Service presents the effects of the proposed alternatives to Curry County, Oregon. One public meeting (starting at 6pm) 2.5 hours away is not adequate public involvement.

Alternative A, also referred to as the No Action alternative, will maintain the current land allocations for the Siskiyou portion of the Rogue River-Siskiyou National Forest.

Currently the Siskiyou Forest Plan has 16% of the Forest (169,816 acres) in planned timber harvest (Matrix). However, Matrix contains unmapped Riparian Reserves (intermittent streams) which are estimated to make up 52% of the area. With unmapped Riparian Reserves removed from Matrix, 7% of the Forest (1,092,302 acres) is programmed for timber harvest (78,713 acres). This remaining 7% also contains an estimated 30% suitable nesting, roosting and foraging habitat for spotted owls which currently cannot be cut. This only leaves an estimated 5% of the Siskiyou National Forest for programmed timber harvest to provide sustainable timber production to support local communities which is inadequate.

None of the proposed alternatives A, B, C or D change these land allocations. Alternatives B, C, and D only modify what can occur within each land allocation.

This Amendment should have been a revision that would allow land allocation location changes, a whole ecosystem management approach including riparian habitat management and not just focused on one aspect (mature and old-growth forest) of the ecosystem.

The synthesis recognized the need for ecosystem management (including early seral habitat) by stating: "the broad goals of forest biodiversity conservation would not be scientifically viable if they focused only on one stage of a dynamic system--all developmental phases and ecological processes must be considered (Spies et al. 2009), including post-disturbance stages (fig. 3), non forest vegetation and younger forests that constitute the dynamic mosaic of vegetation in landscapes of the NWPF area. These other stages and types have distinctive biodiversity and must be considered in any discussion of forest conservation".

Land allocations should be adjusted to a level assuring a higher likelihood of the desired future condition being achievable and risk to communities can be minimized.

There should be more emphasis on providing sustainable deer and elk populations for the food, recreation, and economic value they provide the public and local communities.

Recreation should have greater focus. Increased recreation support was supposed to help offset some of the

impacts from lost timber harvest to local communities.

We support Alternative D because it has more flexibility in active forest restoration and wildfire risk reduction activities, and increased predictability of timber outputs.

Alternative D Includes:

Raises the age threshold for treatments in moist forests in LSR from 80 to 120 years.

Removal of trees in dry forest stands established after 1850 is authorized, to promote ecological integrity and increase flexibility for more intensive treatments which may assist in reversing the effects of long-term fire exclusion in dry forests.

Additional treatments will create more open canopy early-seral habitat supporting grasses, herbs, broadleaf shrubs, and hardwoods, supporting deer, elk, quail, pollinator species and neo-tropical bird species.

Increased enhancement of non-forested ecosystems (e.g., oak woodland; meadow and grassland;

Fuel treatments would have the largest greater public health benefits associated with air quality.

Increases in estimated volumes and jobs would help sustain existing workforce.

Treatments under Alt D are expected to result in safer communities and more effective fire suppression by local resources.

Increased timber harvest levels will increase the amount of funds available for road and trail maintenance, providing more recreational access, as well as fuel treatments.

We support managing the land and resources of the National Forest System to provide for multiple-use and sustained-yield of products and services.

We encourage more local public and county engagement.

Thank you for the opportunity to comment.