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Organization: Native Plant Society of Oregon, Emerald Chapter

Title: Conservation Chair

Comments: 12/3/2025

Dear Ranger Cross,

Thank you for allowing the Native Plant Society of Oregon, Emerald Chapter, to comment on the Tie Timber Sale Project.

As you may know, NPSO is dedicated to the enjoyment, conservation and study of Oregon's native plant habitats, so our comments will be focused on these topics.

We would like to request a few items be addressed in your Environmental Assessment.

First, we would like to know whether you surveyed for rare plants (TES or Species of Concern as well as species on the ORBIC Lists 1-3) and whether you found any. If rare species are located, how do you plan to provide for their persistence? Our Chapter tracks these rare species for our Lane County Flora, so we are quite interested in whether any are found.

Since this project is thinning of stands under 80 years of age, we assume you have not done any surveys for survey and manage species. However, this area seems to overlap with a previous project called Flat Country where surveys were conducted. There may be some incidental occurrences of survey and manage species within the project area. If there are, we would like to know what they are and how you plan to provide for their persistence in your analysis.

Special habitats are another area NPSO is interested in because so much of our native plant diversity is found in meadows, wetlands and rocky areas. We would like to see you detail whether you found special habitats in the project area and what you plan to do to maintain or enhance them in your EA analysis. Will GNA funds be used to restore meadows/wetlands if necessary?

We like to see your mentioning removal of invasive species when you discuss how you will treat fire breaks as sometimes invasives can be ladder fuels. Have you done surveys for invasive plants in the project area and will GNA funds from this project fund noxious weed treatments in the project area once the project is complete?

You mention you will be removing skid roads that are not necessary for fighting fire once their use for timber harvest is complete. Do you plan to revegetate these areas with native species to help outcompete weeds and reduce probability of soil erosion?

We look forward to seeing your Draft Environmental Assessment.

Sincerely,

Jennifer Lippert

Conservation Chair, Emerald Chapter Native Plant Society of Oregon