



January 17, 2019

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E-mail: <https://cara.ecosystem-management.org/Public/CommentInput?Project=53520>

Subject: Comments - Calapooia Draft Environmental Assessment (EA)

The purpose of this letter is to state the Rocky Mountain Elk Foundation's (RMEF) strong support for the Calapooia Project and the active forest management it proposes. RMEF concurs with the EA's stated Purpose and Need for the project. The EA makes the point that there is NO early seral stage vegetation within the 5889 acres of federal land in the Calapooia project area (EA page 15). The 843 acres of active silvicultural management proposed will contribute to restoration of early seral vegetation which is critical habitat for more wildlife species than any other forest seral type (O'Neil 2001). Particularly noteworthy is the improvement of elk (and deer) forage quality and quantity forecast to result from the active forest management (EA page 126).

Comments –

1. EA page v – Table of Contents – Table 26 is missing.
2. EA page 11 – Table 2 includes 289 acres of skips which are areas of no treatment in the total of 1132 acres referred to as “treatments”. This is misleading to the reader. In fact, there are only 843 acres of active treatments.
3. EA page 95 – 3.04 Wildlife, Summary of Effects Analysis. The second paragraph, first sentence states “Alternative 2 would remove or degrade habitat on about 1,132 acres of plantations”. To be accurate this statement must be species specific and it is not. Further, the existence of such a statement casts doubt upon the objectivity of the analysis.
4. EA page 126 – Affected Environment – Deer and Elk. The first paragraph contains in bold type “**Error! Reference source not found.**” The nature of the text in the paragraph indicates this might be where the missing Table 26 should be located.
5. EA page 126 – Environmental Consequences, Deer and Elk. Under Alternative 2 the statement “**Error! Reference source not found.**” appears twice and the nature of text might indicate the missing reference is Table 26.



6. EA p129 – Environmental Consequences – Migratory Birds. Under Alternative 2 the first sentence states “Commercial thinning for Alternative 2 would degrade or remove habitat on about 1,132 acres of plantation stands between 36 to 60 years of age.” To be accurate this statement must be species specific and it is not. The acreage figure is not correct as it includes 289 acres of skips where there will be no thinning. This analysis ignores the fact that within the project planning area the distribution of vegetative seral classes does not fall within the historic range distribution of seral classes, and that restoring species diversity and structural complexity are a stated purpose and need of the project.
7. Consider acknowledging the acreage of the 8 miles of decommissioned temporary and system roads that when revegetated will contribute to the acreage of early seral habitat developed by the project.

The Rocky Mountain Elk Foundation is a non-profit conservation organization whose mission is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. The Elk Foundation also works to open, secure and improve public access for hunting, fishing and other recreation.

Thank you for the opportunity to submit comments on this project.
Sincerely,

Bill Richardson
Oregon & Washington Sr. Lands Program Manager
Rocky Mountain Elk Foundation

Reference:

O'Neil, T.A., D.H. Johnson, C. Barrett, M. Trevithick, K.A. Bettinger, C. Kiilsgaard, M. Vander Heyden, E.L. Greda, D. Stinson, B.G. Marcot, P.J. Doran, S. Tank, and L. Wunder. *Matrixes for Wildlife-Habitat Relationship in Oregon and Washington*. Northwest Habitat Institute. 2001.