

Tom Montoya, Forest Supervisor
Attn: Objections
1550 Dewey Ave.
Baker City, OR 97814

October 2, 2019

Bill Harvey
Commission Chair
bharvey@bakercounty.org

Dear Supervisor Montoya,

Baker County appreciates the opportunity to provide objections as a governing body with special privileges into the Two Eagle Vegetation Management Project. The County opposes the Forest Service conducting planning and/or action without the County having waived the opportunity to coordinate, which we have not done.

Baker County provided comments during the scoping process and therefore, has standing to make comments and objections to the current request.

The Baker County Board of Commissioners is charged with governing the County in the best interests of its citizens, their health, safety, and welfare, its economic base, and the natural environment. The economic viability of Baker County relies on both private and public lands for use of natural resources. Federal lands comprise over 50% of Baker County making any federal land use decision a direct impact on local customs, cultures, and socioeconomic conditions.

Within the Alternatives proposed in the Two Eagles project there are both activities that the County supports, as well as those the County objects to. Baker County supports Alternative 2M, the Proposed Action, if several caveats are met.

First and foremost, the County did not receive notification of either the draft EA in June of 2019, or the final EA in August 2019. It was by sheer luck that the notice in the La Grande Observer was read by staff. The Observer is not the Newspaper of Record for Baker County and putting the Notice in it makes it appear that the La Grande Ranger District did not, in fact, want input from the government or citizens of Baker County. The submission of only two comments on the draft EA proves that this project was not properly noticed. On page 6 of the EA, it states, "Management on the Wallow-Whitman Forest, as with other national forests across the country, has resulted in distrust amongst public stakeholders, and between public stakeholders and the Forest Service resulting in a lack of social agreement around active forest restoration treatments."

Transparent local government and public noticing procedures would go a long way in restoring the public's trust in the Forest Service.

"Public involvement is an integral part of identifying key issues to be addressed in the analysis." This is most likely the truest statement in the EA. By not including the public in the draft EA process, the Forest Service lost valuable input from the County and the public.

In addition, terms and acronyms used within NEPA documents should be readily understandable by the public. Definitions and use of common terms would also create an unambiguous document.

Proposed Action and Alternatives

As discussed above, Baker County supports Alternative 2M with caveats. Therefore, the other Alternatives will not be addressed in this Objection.

Elements Common to the Action Alternatives

Priority Treatment Areas

Baker County supports and encourages the treatments adjacent to the Eagle Creek/Tamarack WUI and project areas within 1-mile of private land and the strategic fuels breaks along road systems and ridges to create

Priority One: Eagle Creek/Tamarack WUI and project areas within 1-mile of private land

The 2012 Baker County Community Wildfire Protection Plan (CWPP), describes the Eagle Creek/Tamarack WUI as being comprised of seasonal recreation dwellings and USFS infrastructure including campgrounds and Two Color historic guard station, and is located southwest of the Eagle Cap Wilderness along National Forest Road 77 and Eagle Creek. There is no structural fire protection agency and wildfire protection falls to the USFS and Oregon Department of Forestry (ODF).

Specific hazard issues associated with the WUI include: high recreational use, access due to topography, inefficient emergency notification of residents, lack of alternative evacuation routes, ingress/egress to home, private bridges with limited load capacity, lack of structure protection, extended response time, lack of defensible space around structures, structure located in forested areas, high fuel

loading associated with overstocked forest stands, and proximity to Eagle Cap Wilderness.

Goals for the WUI include: Create, restore, and maintain community fuel breaks, defensible fuel profile zones, and evacuation routes sufficient to minimize the risk and damage cause by wildland fire within the WUI, by removing dead and down material, thinning standing trees and shrubs, underburning, chip/burn piles, and utilize biomass where cost effective.

In August of 2015, the Eagle Fire burned several thousand acres along Forest Service Road 77 near Tamarack Camp Ground, Bennett Peak and Main Eagle areas associated with the Eagle Complex a Level 2 evacuation notice was sent to residents. Today, weakened trees are succumbing to beetle kill, thereby leading the way to another destructive wildfire in the area. Baker County supports the Forest Service in the development of a project, preferably a categorical exclusion, to move forward in a rapid manner to remove the dead and dying trees.

Priority Two: Strategic fuels breaks along road systems and ridges to create DFPZs

Also known as fuelbreaks, Defensible Fuel Profile Zones (DFPZs) along roads and ridges are a good method to reduce surface fuel loads. Baker County supports using lateral fuelbreaks to help reduce wildfire momentum.

Silviculture Treatment Objectives

Baker County supports most of the Silviculture treatments to promote fire resiliency and improve forest health, however, there is need to increase the treatment area and not focus on treatment methods, such as converting stands from a multi-story canopy to a single story canopy to restore deficient Old Forest Single Story Structure (OFSS) conditions.

Improvement Harvest (HIM)

The OFSS conditions will promote a homogenous, single-age stand, at the end of the trees' lifespan in lieu of promoting structural variation that would improve stand resiliency. In addition to creating a homogenous forest, there are economic ramifications. The Forest Service will be required to conduct an under-burn every 10 yrs to maintain the single-age forest costing thousands of dollars. In addition, by conducting the OFSS, the Forest Service eliminates the opportunity for logging and processing at local mills which has a direct impact on the County's economic viability.

Patch Openings (HPO)

Baker County supports the use of the Patch Openings prescription. This action not only provides for a more 'natural' look, but also has the potential for future harvest operations to continue to meet the desired stocking rates. However, the County opposes leaving any untreated areas within the treatment units.

The Improvement Harvest and the Patch Openings are in direct opposition. The Patch Openings are being suggested for homogenous areas that the Improvement Harvest creates.

Post-harvest Follow-up

The County supports monitoring post-harvest. However, the County does not support reforestation even when the stocking level is low. Economically, allowing for natural regeneration is a viable option especially when other options such as prescribed and slash burning are used. Monitoring should focus on noxious weed growth, forage improvement, and increased water quality/quantity.

Fuels Reduction

The County supports fuels reduction and the corresponding objectives and encourages the Forest Service to increase the number of acres being treated. However, the single goal should be a wildfire resilient forest rather than one more consistent with historic structure.

Fuels Reduction (RWF)

Baker County supports this treatment and encourages the Forest Service to increase the number of acres treated. In addition, the County is willing to contact private landowners along the boundary to promote fuels treatments on both sides of the fences. This is a win-win for everyone as the wildfire risk is reduced, the forest grows healthier, and, just as importantly, private landowners are included in a project that benefits them ecologically and economically.

Pre-commercial Thinning (PCT)

Baker County supports this treatment with caveats. Reduce the percent (10%) of untreated acres to a smaller percent, if absolutely needed as per the silviculturist, to bring the forest back into a fire resilient state. A healthy forest will provide habitat and diversity without manmade interventions such as leaving untreated areas.

Fuels Blocks – Prescribed Burning

The County supports prescribed burning and encourages the Forest Service to use it judiciously on both the north and south facing slopes and increase the acres to reduce fuel loads over larger areas. This is especially important within riparian areas that generally are not included within prescribed burn plans. By allowing fire into the riparian areas, the threat of wildfire will decrease and vegetation such as quaking aspens will increase in response to the fire.

Fire Prescriptions

Baker County supports the use of low intensity burning whenever, and wherever, possible to decrease the fuel load using actions that are low cost and highly effective.

Mechanical Fire Lines

Increase the width of mechanical fire lines to correspond to the type of vegetation being burned. A two-foot fire line will not hold in an area consisting of six to eight feet tall shrubs or tall grasses, forbs, and small diameter trees.

Roadside Hazard Trees

Do not limit the number of danger trees that will be removed. Safety of the timber haulers and the public as they use haul roads is infinitely more important than stating that only 15 trees/mile will be removed.

Riparian Habitat Conservation Area (RHCA)

Baker County supports low intensity burning within riparian areas to reduce the fuel load, increase vegetation that responds favorably to fire, and eliminates riparian areas becoming chimneys when wildfires travel through the landscape.

Scenic Resources

Scenic integrity is important, but not nearly as important as getting the treatments successfully completed. Too, it promotes public conversations when forest visitors see actions happening on the ground and ask questions.

Connective Corridors

Baker County opposes connective corridors in any form. Wildlife can move freely within healthy forests to best meet the needs of the species without having special areas designated for their travel. The County does not support the retention of trees with as little as 20% live crown as they pose a risk should a wildfire move through the area. These untreated corridor areas will act to allow fires to move throughout the forest system.

Snags in Harvest and Fuel Reduction Units

Protection of existing snags in a treatment is acceptable unless they are found in a number that poses threats of wildfire, pose safety hazards to roads, or fall and block access.

Post-Sale Road Management Plan

There is no Blue Mountains Travel Management Plan, therefore, all roads that are to be decommissioned, closed, or require permits must be reviewed with Baker County. The Wallowa-Whitman is a designated 'open' road area.

36 CFR § 212.53 Coordination with Federal, State, county, and other local governmental entities and tribal governments

The responsible official shall coordinate with appropriate Federal, State, county, and other local governmental entities and tribal governments when designating National Forest System roads, National Forest System trails, and areas on National Forest System lands pursuant to this subpart.

Baker County is requesting that all post-sale roads be left open for 15-years for public access to collect firewood.

Baker County's Natural Resources Plan (2016) states that there will be no net loss of roads.

Enhancement Work

Campsite Improvement

The Eagle Creek area is popular with local communities and visitors. Guests drive hundreds of miles to enjoy the opportunities this area has to offer. Baker County supports formalizing campsites and creating alternate access points for others.

The County does not support closing the campsites that the Forest Service have designated as having "deleterious environmental effects". Many generations have used dispersed campsites and to close them would be wrong. Instead, the County suggests bringing campsites into an environmentally sound condition or accept that through years of use the campsite will never return to historic conditions. The County also suggests that Forest Service personnel provide good customer service by visiting with campers when they are using the campsites.

The County supports extending the time allowed for camping from 14-days per year to 30 days per year.

Interpretive Site Creation

The County supports the use of interpretive sites wherever feasible to provide education and information to the public. Perhaps, interpretive sign placement could be conducted in the Two Color campground to explain the importance of staying on the road in lieu of lining the roadway with boulders.

Meadow Restoration

Baker County supports the restoration of the meadow behind Two Color Guard Station through the use of buck and rail fence. However, in order to reduce channel down-cut, the County does not recommend the installation of sod mats to create channel stabilization structures. The preferable treatment is proper channel stabilization using erosion blankets, coir rolls, or riprap based on specific site consideration such as channel slope, length, flow velocities and soil. Because sod mats have to be removed from hydrologically similar zones, it exposes native soils and makes them susceptible to noxious weeds, the donor site has the potential for erosion and ponding (which will kill any new vegetative growth), and if the sod mats are removed with mechanical equipment there will be a significant added cost.

Wildlife Mitigation Measures

Down Woody Material

The County requests that the pieces per acre of down woody material be kept at the minimum as per the Forest Plan.

Big Game Winter Range

The County supports waivers to conduct logging operations from December 1 – April 1 as the conditions allow. Ungulates regularly frequent logging sites where down trees and limbs will provide moss and lichens that are utilized as feed during the winter months.

Diameter Harvest Limits

Baker County vehemently opposes the 21-inch rule. There is no scientific validity or wildlife benefit to leave trees over 21-inches. Neither diameter or age should be used as a justification to leave a tree, rather, removal must be based on the tree's health, species, and other factors (i.e. basal area, plant associations, etc.). For example, a tree with a diameter of 30-inches and 150 years old should be removed if it is affected by disease or insects. Allowing large diameter trees to remain puts the rest of the forest at risk of exposure to the offending invader(s).

Proposed, Endangered, Threatened, and Sensitive Plant Species

Baker County does not support the designation of an “Area to Protect” on plants, that according to peer reviewed research do not grow in Baker County and some have not been seen closer to the project area than the west side of the Cascades. According to research, *Botrychium pedunculosum*, *Ophioglossum pussillum*, *Albatrellus avellaneus*, and *Pseudorhizina californica* do not occur in Baker County (see attached references). However, it appears that a Forest Service employee documented them during site visits, though the number of plants were very minimal. Baker County requests proof of sightings with documentation and photos.

Other TES identified during the pre-field review:

Common Name	Occurrence in Project Area
Wallowa ricegrass	“this species has not been documented on the La Grande or Whitman Ranger Districts,”
<i>Botrychium crenulatum</i> <i>B. minganense</i> <i>B. montanum</i>	“There are no know <i>Botrychium</i> populations of these species within the analysis area...”
<i>Carex cordillerana</i>	“Eight occurrences were discovered near Two Eagle in 2008...”
Retros sedge	“observations were made of riparian areas when encountered”
Clustered lady-slipper	“no documented sites on the forest”
Northern twayblade	“there are no known sites...”
Bridge’s Cliff-brake	“There are no known sites...”
Dwarf phacelia	“...none were found.”

The County does not support treating “potential” or “non-occupied” habitat in the same manner as occupied habitat. A healthy forest allows for the expansion of habitat without designating special treatment.

Common Name	Occurrence in Project Area
Rocky Mountain Tailed Frog	“are not known to occur in project area”
Bald Eagle	“no known winter foraging areas within or adjacent to the project area” “no bald eagle sightings within or adjacent to the project area”
Canada Lynx	“categorized as a “peripheral area” “considered “unoccupied” habitat”

Gray Wolf	"a breeding pack (Catherine Creek Pack) has been identified as using the project area"
California Wolverine	"There are no known den sites on the Forest" "...no wolverine tracks were found"
Fringed Myotis	"There are no known records of fringed myotis in the project area."
Shiny Tightcoil	"This species is not known to occur within the project area..."
Johnson's Hairstreak	"It is unknown if this species occurs within the project area."
Western Bumblebee	"rare throughout much of its range and is in decline" "it is unknown what the current "Documented" status is..."

Managing Competing and Unwanted Vegetation (Invasive Species)

Baker County supports the use of Early Detection, Rapid Response (EDRR) to address invasive species including noxious weeds and insects. Invasive species pose one of the greatest threats to the Nation's natural resources. The stakes are high: if left to spread, invasive species cost billions of dollars to manage and can have devastating consequences on the Nation's ecosystems (Pimentel 2003, Pimentel et al. 2005; Aukema et al. 2011). EDRR is a coordinated set of actions to find and eradicate potential invasive species before they spread and cause harm. The site-based nature of EDRR actions also requires partnerships and coordination across multiple scales. Baker County welcomes the chance to partner with the Forest Service to address invasive species issues.

The success, or failure, of noxious weed establishment rests solely on monitoring the project sites. Noxious weeds can, and will, take advantage of exposed soil, change in soil heat through a reduction in canopy, modifications to decommissioned roads, and anything else that will provide enough soil, light, moisture, and increased potential for seed movement.

Weed treatments (herbicides) must occur over several years and include reseeding the area. The County recommends using a mix of native and introduced seeds to ensure that the treated area gets vegetated in a rapid manner. Often, native seeds take longer to germinate and allow weeds to reestablish and soil erosion to occur.

The County supports the aggressive measures for noxious weed control listed in the EA.

Please use the Baker County Noxious Weed List instead of the Union County Noxious Weed List as the project lies entirely in Baker County. The Lists are similar, but not identical.

Scientific Name	Common Name	Gross Acres	Baker County Designation	Oregon State Designation
<i>Cardaria draba</i>	Whitetop	72.6	B	B
<i>Centaurea diffusa</i>	Diffuse knapweed	73.9	A	B
<i>Centaurea maculosa</i>	Spotted knapweed	0.1	A	B (T)
<i>Cirsium arvense</i>	Canada thistle	266.7	B	B
<i>Cynoglossum officinale</i>	Gypsyflower (Houndstongue)	340.5	Not on list	B
<i>Hypericum perforatum</i>	St. Johnswort	2.3	B	B
<i>Onopordum acanthium</i>	Scotch thistle	11	B	B
<i>Potentilla recta</i>	Sulphur cinquefoil	0.1	B	B
Total		767.3		

Baker County Weed List is attached

If the Forest Service is truly concerned with expansion of noxious weeds, any road decommissioning, tank traps, and other soil/road bed disturbing techniques to close roads would cease.

Scenery Management Mitigation Measures from roads 6700, 7700, and 7755 Foreground

The County appreciates that the Forest Service has taken scenery into consideration. However, it's also a learning opportunity for the public to visualize what goes on to keep the forests healthy. Baker County opposes, "Clearings less than 2 acres can be used to treat insect and disease infestations...". Treatments must be focused on promoting healthy, fire resilient forests. Recently we were advised by private landowners that fire weakened trees on Forest Service managed lands near Eagle Creek have succumbed to beetles, leaving large swaths of forest dead and dying and infecting private lands. This area must be harvested

as soon as possible, to the fullest extent, to remove all beetle infested trees and not worry about how the area is going to look or the financial benefits.

Wildlife

Rocky Mountain Elk

Baker County does not support forest management practices based on a single species, rather the County prefers a healthy ecosystem that provides habitats for diversity of species.

The County believes that the Forest Service uses the excuse of 'elk security' to close more roads and reduce access to public lands. Elk management, including their habitat, is a very complex topic that must be developed through coordination between wildlife agencies, public and private land managers, and coordinated with affected counties for the following reasons:

- The complex concept of elk security is not going to be answered by simply closing roads. In fact, while roads may, or may not, effect elk movement as significantly as some studies suggests, other studies have shown that quality forage and cover are just as much, if not more, important.
- Elk numbers in Oregon, including Baker County, have increased over the last several years. The increase occurred without closing roads or otherwise modifying forest habitat.
- Elk should be treated as no more culturally significant than deer, antelope, bear, grouse, turkey, and multiple other mammal, bird, and fish species. Subsistence living and cultural significance has historically incorporated all of these.
- The life cycle, feeding habits, calving habits, and everything else that goes into what makes an elk are not representative, or duplicative, to forest dwelling mammals as a whole. For example, elk eat a diet primarily of grasses, some forbs, and minimally consume tree lichen and shrubs, whereas deer rely on browsing shrubs with smaller consumption of grasses and forbs. Elk may not be the best healthy ecosystem indicator species due to their adaptability.
- Cow elk and bull elk have different habitat needs based on their life-stage. This is going to affect security throughout the year. The migratory tendencies of elk will further complicate the connective corridor placement.

"This, traditional concepts of elk security habitat which consisted of large tracts of heavily timbered and low road density public land may need to be refined to

include private lands that prohibit or restrict hunter access.” (Proffitt, K.M., J.A. Guide, K.L. Hamlin, and M.A. Messer, 2013. Effect of hunter access and habitat security on elk habitat selection in landscapes with public and private land matrix. Journal of Wildlife Management 77:514-524)

“Security”

“Road closures are consistent across alternatives and will have a positive effect on elk security by increasing the amount of moderate and high quality security area.” (Two Eagle Vegetation Management Project, Page 88) “Proposed road closures across all alternatives will increase security habitat within the project area and will have a positive effect on distribution and escapement.” (Two Eagle Vegetation Management Project, Page 89) Baker County has a no net loss of roads policy. The County does not support road closures for *any* reason.

Water Quality

Hidden within the section on Water Quality is a discussion regarding roads. In regards to water quality, “In the long-term, road maintenance activities would reduce adverse effects to aquatic habitat by reducing overall erosion rates from the road system.” (Two Eagle Vegetation Management Project, Page 129) This statement supports Baker County’s position on access.

Baker County supports the maintenance of roads that will provide for safe travel of logging equipment and the public. In the long run, maintained roads reduce the amount of sediment entering a stream, provide safe access for emergency personnel (search and rescue, firefighters, law enforcement), makes access for monitoring easier, and increases the safety of the public.

The County supports the opening of roads and leaving them open at the completion of the project. Maintenance is not necessary. If the road is used then it will be kept open through that use, if it is not used, it will revegetate without human intervention. This approach drastically reduces the cost of the project.

Post Sale Road Decommissioning Plan

“Even after roads are closed to vehicular traffic, road features would still be on the landscape and could have sediment input if maintenance issues occur such as undersized or plugged culverts, disturbance of run off patterns, lack of ditches and cross drains which cause road prism erosion.” (Two Eagle Vegetation Management Project, Page 130) The County questions the validity of wasting funds on practices that may not be effective – keep roads opened and minimally maintained, if necessary to allow for future monitoring, administration, and emergency access.

Subwatershed	Open Road Miles Existing	Open Road Miles Post Project	Open Road Density Existing	Open Road Density Post Project
Bennet Creek- Eagle Creek SWS	14.45	11.3	4.36	3.41
Upper Eagle Creek SWS	8.58	8.32	4.53	4.40
West Eagle Creek SWS	18.44	13.67	3.05	2.26
Total	41.47	33.29		

Road density is based on topography – the landscape dictates the road needs.

In a letter dated August 23, 2019 from Bill Gamble, La Grande District Ranger, he states, “Three gates were added to maintain administrative access while improving wildlife habitat and public safety.” This was in response to Baker County’s comment to the Scoping of “Do not permanently close roads.” The statement from Mr. Gamble and the above table are direct opposites.

The Forest Service needs to understand that ‘decommissioning roads’ effectively, and in fact, closes them. Again, the 1990 Forest Plan states that all roads are “open”.

Temporary Roads

Baker County supports opening temporary roads and leaving them open 10-15 years to provide the public access to firewood and subsistence activities, as well as providing entry for follow-up projects such as prescribed burning and thinning.

Climate Change

Baker County reminds the Forest Service that the below document makes the Global Climate Change sections(s) of the Two Eagle Vegetation Management Project null and void. Therefore, any perceived impacts cannot be used in a management decision.

Executive Order 13783 of March 28, 2017

Promoting Energy Independence and Economic Growth

Sec. 3. Rescission of Certain Energy and Climate-Related Presidential and

Regulatory Actions. (a) The following Presidential actions are hereby revoked:

(i) Executive Order 13653 of November 1, 2013 (Preparing the United States for the Impacts of Climate Change);

- (ii) The Presidential Memorandum of June 25, 2013 (Power Sector Carbon Pollution Standards);
 - (iii) The Presidential Memorandum of November 3, 2015 (Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment); and
 - (iv) The Presidential Memorandum of September 21, 2016 (Climate Change and National Security).
- (b) The following reports shall be rescinded:
- (i) The Report of the Executive Office of the President of June 2013 (The President's Climate Action Plan); and
 - (ii) The Report of the Executive Office of the President of March 2014 (Climate Action Plan Strategy to Reduce Methane Emissions).
- (c) The Council on Environmental Quality shall rescind its final guidance entitled "Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews," which is referred to in "Notice of Availability," 81 *Fed. Reg.* 51866 (August 5, 2016).

Economics

The County appreciates the economic benefits that the Two Eagle Vegetation Management Project will provide.

Transportation and Road Management

There is no Travel Management Plan associated with the 1990 Plan, nor has one been developed for the Wallowa-Whitman Forest, therefore, any reference or use of the 2015 Wallowa-Whitman Travel Analysis report (WWNF TAR) (Subpart A of the Travel Management Rule) is null and void. It was put on hold, and remains so. Because of this, all road closures, decommissioning, gating, and other means of blocking access, must be coordinated with the County prior to action.

Baker County does not believe that any road closures are needed.

Baker County has many RS 2477 Rights of Way. These rights of way provided historic access to mines, homesteads, post offices, etc. and predate the Forest Service. While the County understands that due to federal policies the Forest Service cannot authorize these rights of ways as belonging to the County, the law that defines them is still valid and Baker County will continue to treat them as public land access. Any RS 2477 rights of way within Baker County will remain open until such time that the County formally abandons/vacates it using the proper, legal procedures.

The County understands that the use of gates to close roads is not permanent. However, gates still eliminate access to the public. The County does not support the use of gates, or any other manner, of road closure for “wildlife security”.

Range

Baker County does not support closing allotments or allowing them to remain vacant. A change in land use, in these cases vacating allotments, must go through Congress. It is unclear why the Forest Service would allow the vacancies of allotments as studies have shown that livestock reduce forage to heights that do not carry fire well, thereby promoting low-intensity burns.

The County would support the Forest Service in active range management including building and maintaining boundary fences, development of off-stream watering, reduction in AUMs if absolutely necessary, but most importantly, communication with the permittees should an issue arise, and if not properly addressed in a reasonable amount of time, removal of the livestock for a set number of years (2-4 to allow forage regeneration). Management is the responsibility of both the Forest Service and the permittees.

Baker County does not support decommissioning roads that provide permittee access to manage the allotments. It is critical that permittees be allowed to place salt and mineral blocks, check water supplies, forage availability, and stock health, as well as maintain fences. It is irresponsible and disingenuous of the Forest Service to complain about fence conditions, cattle trespass, and over use of the forage, but will not allow for allotment management access.

Other Undeveloped Lands

Baker County reminds the Forest Service that the Blue Mountain Forest Plan Revision DEIS 2014 (BMFPR) was rescinded in its entirety, therefore any inventories and analysis that the document contained are null and void and cannot be used for management determinations.

There are no forest-wide or management area standards specific to other undeveloped lands in the 1990 Wallowa-Whitman Forest Plan. The County supports the consistent management of forests including Roadless Areas.

Finding of No Significant Impact

Baker County supports this determination.

In conclusion, Baker County found the overall actions within this project to be an acceptable approach to forest management. It proposes common sense activities and maintains the multiple use mandate. The inclusion of road closures and elk (wildlife) security are not good practices for reducing fire threat or fuels reduction in the forest. It's unfortunate that the Forest Service did not notify and coordinate with the County from the beginning. Many of the County's concerns could have been addressed at that time.

The County welcomes and invites the Forest Service to face to face meetings through the coordination process for discussions on this, and other projects.

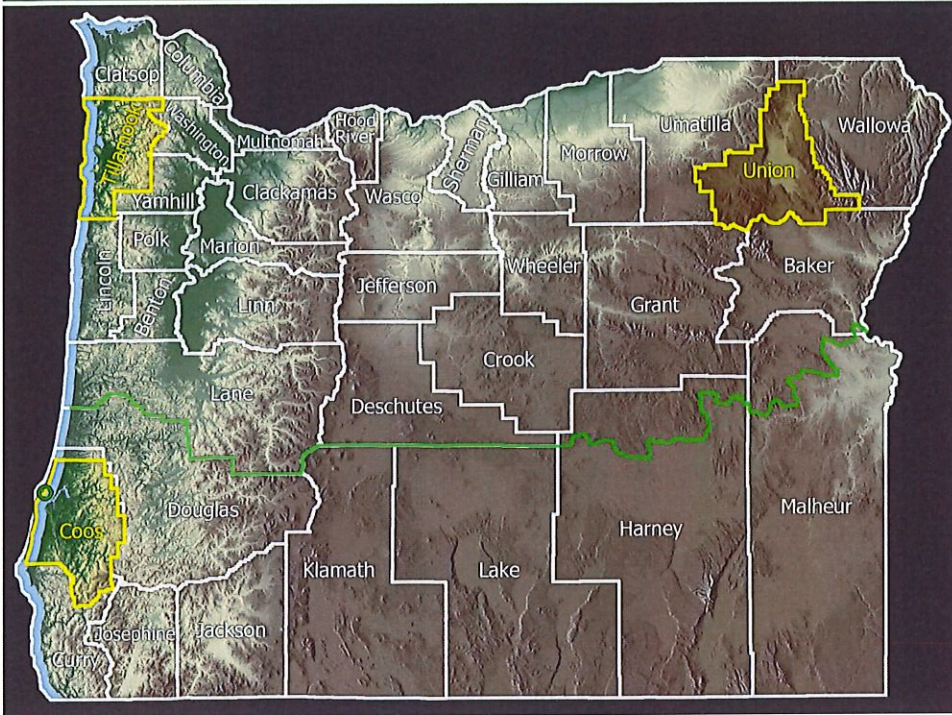
Sincerely,



Bill Harvey, Chair
Baker County Commission

Albatrellus avellaneus

PNW	BC	ID	OR	WA
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**21 specimens from 2 herbaria:**

British Columbia (4)

Idaho (1)

Oregon (3)

Coos (1)

Tillamook (1)

Union (1)

Washington (13)

14 images from 1 herbaria:

WTU (14)


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- Classification
- Cover Crops
- Culturally Significant
- Distribution Update
- Documentation
- Fact Sheets & Plant Guides
- Introduced, Invasive, and Noxious Plants
- Threatened & Endangered
- Wetland Indicator Status

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Related Tools

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- Ecological Site Information System
- PLANTS Identification Keys
- Plant Materials Web Site
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GENERAL

CLASSIFICATION

LEGAL STATUS

RELATED LINKS

Botrychium pedunculatum W.H. Wagner

stalked moonwort

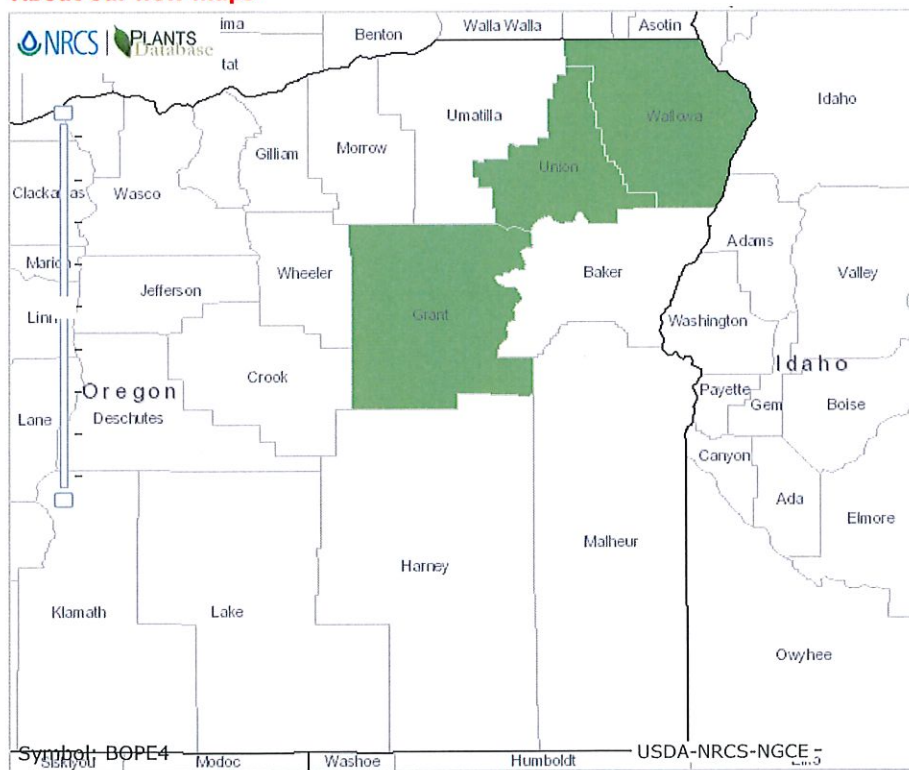
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General Information

Symbol:	BOPE4
Group:	Fern
Family:	Ophioglossaceae
Duration:	Perennial
Growth Habit:	Forb/herb
Native Status:	AK N CAN N L48 N

Data Source and Documentation

About our new maps



Symbol: BOPE4

USDA-NRCS-NGCE

- Native
- Introduced
- Both
- Absent/Unreported
- Native, No County Data
- Introduced, No County Data
- Both, No County Data

Native Status:

- L48
- AK
- HI
- PR
- VI
- NAV
- CAN
- GL
- SPM
- NA

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PLANTS Topics

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- Threatened & Endangered
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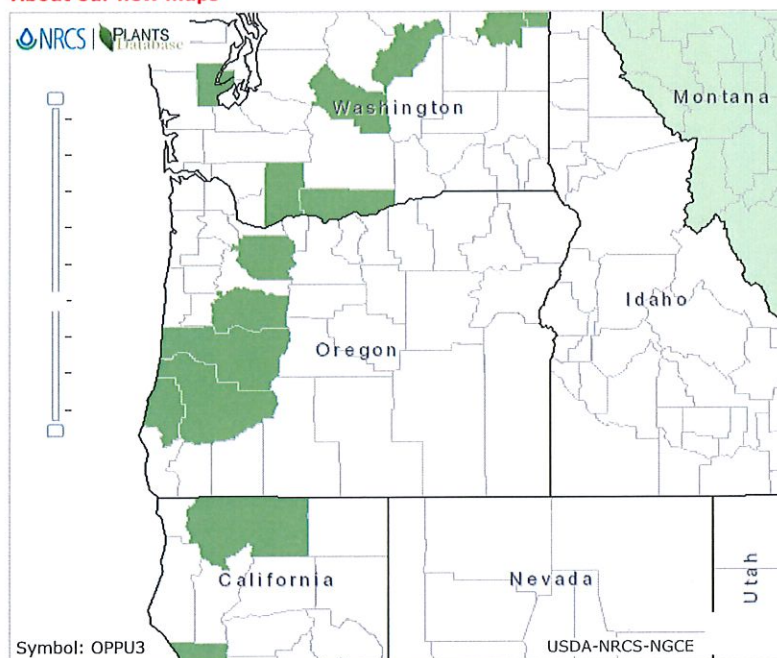
- Complete PLANTS Checklist
- State PLANTS Checklist
- Advanced Search Download
- Symbols for Unknown Plants
- NRCS State GSAT Lists
- NRCS State Plants Lists

Related Tools

- Crop Nutrient Tool
- Ecological Site Information System
- PLANTS Identification Keys
- Plant Materials Web Site
- Plant Materials Publications
- USDA Plant Hardiness Map

You are here: [Home](#) / [Plant Profile](#)
[GENERAL](#) | [IMAGES](#) | [SYNONYMS](#) | [CLASSIFICATION](#) | [LEGAL STATUS](#) | [WETLAND](#) | [RELATED LINKS](#)
***Ophioglossum pusillum* Raf.**
northern adderstongue
[Show All](#)**General Information**

Symbol:	OPPU3
Group:	Fern
Family:	Ophioglossaceae
Duration:	Perennial
Growth Habit:	Forb/herb
Native Status:	AK N CAN N L48 N SPM N

Data Source and Documentation**About our new maps**

☒ Native
 ☒ Introduced
 ☒ Both
 ☐ Absent/Unreported
☒ Native, No County Data
 ☒ Introduced, No County Data
 ☒ Both, No County Data

Native Status:

☒ L48
 ☒ AK
 ☐ HI
 ☐ PR
 ☐ VI
 ☐ NAV
 ☒ CAN
 ☐ GL
 ☒ SPM
 ☐ NA

SPECIES FACT SHEET

Common Name: false morel

Scientific Name: *Pseudorhizina californica* (W. Phillips) Harmaja 1973

Species synonymy: *Gyromitra californica*, *Helvella californica*

Division: Basidiomycota

Class: Pezizomycetes

Order: Pezizales

Family: Discinaceae

Conservation Ranking and Status:

Global: G4

State: OR S2

Oregon Biodiversity Information Center (ORBIC) List 2

(Ranks from ORBIC, <http://orbic.pdx.edu> accessed August 16, 2013)

Technical Description: **Head** up to 10 cm or more broad, convex with numerous undulations and irregularities, brown-gray to gray-brown. **Stem** up to 10 cm long and 6 cm wide, deeply and irregularly fluted, stem base may be flushed with tints of pink to pink-tan while the upper part is cream-colored to white. **Spores** ellipsoid, (14-) 16.1-20.3 x (7.5-) 8.4-10.7 μ m, smooth.

Other Pacific Northwest cup fungi with brownish, convoluted/undulated (but not mitrate nor saddle-shaped) heads include *Gyromitra montana* and *G. esculenta*. The stem of *G. montana* is only slightly less broad than the head, and about as long as wide. The stem of *G. esculenta* is 2-5 cm long, 1-2 cm thick and not fluted.

Life History: This cup fungus is a litter/wood saprobe; sporocarps are produced in spring and early summer.

Range, Distribution and Abundance: Known from within Oregon and Washington portions of the Northwest Forest Plan Area, including the Washington Eastern Cascades, Washington Western Cascades, Washington Olympic Peninsula, Oregon Eastern Cascades, Oregon Western Cascades and Oregon Klamath Physiographic Provinces. Known from around 85 sites in Oregon and Washington. There were 4 detections of this species during Random Grid CVS/FIA plot surveys: Mt. Baker-Snoqualmie and Olympic National Forests in Washington, and Willamette National Forest in Oregon.

FS/BLM lands in Oregon and Washington: Documented on Spokane and Lakeview Districts BLM. Documented on the Colville, Deschutes, Fremont-Winema, Gifford Pinchot, Mt. Baker-Snoqualmie, Mt. Hood, Okanogan-

Wenatchee, Olympic, Rogue River-Siskiyou, Siuslaw, Umpqua and Willamette National Forests.

Habitat Associations: Occurs on or adjacent to well-rotted stumps or logs of coniferous trees, on litter, or soil rich in brown rotted wood; also found on soil along streams, skid trails and recently disturbed soil. Found in Pacific Silver Fir (35%), White Fir-Grand Fir (27%), Mountain Hemlock (23%), Western Hemlock (5%), Ponderosa Pine (3%), Rock (3%), Subalpine Fir-Engelmann Spruce (3%), Douglas Fir (1%), Grasslands-Meadows (1%) vegetation zones at elevations of 668-6515 feet. Associated species include Pacific silver fir, white fir, red fir, lodgepole pine, sugar pine, ponderosa pine, Douglas fir, Engelmann spruce, western red cedar, western hemlock, mountain hemlock, red alder and quaking aspen. Other woody associates include *Acer circinatum*, *Arctostaphylos* sp., *Berberis aquifolium*, *Castanopsis chrysophylla*, *Ceanothus velutinus*, *Chimaphila umbellata*, *Cornus canadensis*, *Linnaea borealis*, *Oplopanax horridum*, *Pachistima myrsinites*, *Prunus* sp., *Rhododendron albiflorum*, *Rhododendron macrophyllum*, *Ribes bracteosum*, *Rubus* sp., *Vaccinium alaskaense*, *Vaccinium membranaceum* and *Vaccinium scoparium*.

Threats: It is reasonable to anticipate that threats to local occurrences of this species include events and/or activities that negatively impact either the fungal mycelium or its litter substrate. Such impacts can be caused by moderate to severe fire, removal of large woody debris and litter-producing canopy layer, and soil compaction.

Conservation Considerations: Revisit known localities to confirm persistence and determine extent of populations. Conduct surveys to locate new populations. Buffer known sites from adjacent vegetation management activities. When conducting vegetation management activities in areas with good habitat potential, consider leaving scattered and clumped host trees and ample coarse woody debris, while minimizing soil compaction and burn severity of activity-related fires.

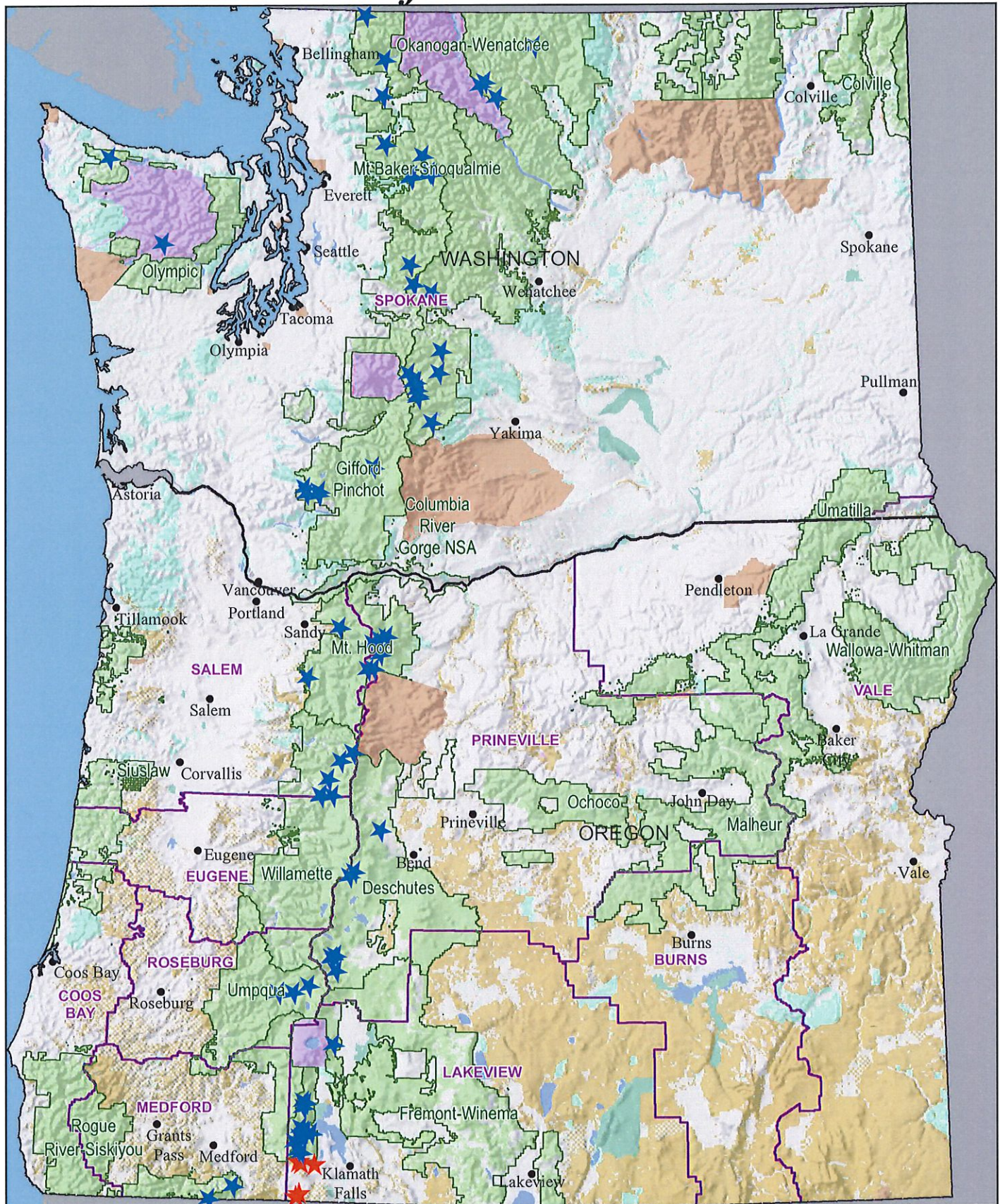
Other pertinent information (includes references to Survey Protocols, etc): The survey protocol for fungi is located on the ISSSSP website: <http://www.fs.fed.us/r6/sfpnw/issssp/documents/inventories/inv-sp-fu-ver1-2008-12.pdf>.

The survey protocol for Survey and Manage fungi is located on the Survey and Manage website: <http://www.blm.gov/or/plans/surveyandmanage/protocols/>

Fungus

Pseudorhizina californica

PSCA17



This product is produced from information from multiple sources. The Forest Service can not assure the reliability or suitability of this information for a particular purpose. Data accuracy may vary. This information may be modified without notification. For more information contact: Interagency Sensitive and Special Status Species Program Specialist, USFS/BLM, 503-808-2661

0 15 30 60 90 120 Miles

Fungus Data Source Jurisdiction

- ★ BLM GeoBob
- ★ FS NRIS TESP

- All other lands
- U.S. Forest Service
- Bureau of Indian Affairs

- Bureau of Land Management
- National Park Service
- U.S. Fish and Wildlife Service
- State Land

Date: 1/30/2013

2019 Baker County Noxious Weeds

“Watch List”, “A”, “B” & “C” Designated Weeds

“A” List Weeds are Eligible for Cost-Share

“Watch List” – Very Few Known Sites; Controlled by the Weed Supervisor County-Wide

- | | |
|-----------------------|----------------------------|
| 1. Musk Thistle | <i>Carduus nutans</i> |
| 2. Mediterranean sage | <i>Salvia aethiopsis</i> |
| 3. Dyers Woad | <i>Istaxis tinctoria</i> |
| 4. Common bugloss | <i>Anchusa officinalis</i> |
| 5. Common crupina | <i>Crupina vulgaris</i> |

“A” Designated Weeds – Mandatory Control County-wide and eligible for 50% Herbicide Refund

- | | |
|-------------------------|-------------------------------|
| 1. Tansy ragwort | <i>Senecio jacobaea</i> |
| 2. Leafy spurge | <i>Euphorbia esula</i> |
| 3. Rush skeletonweed | <i>Chondrilla juncea</i> |
| 4. Spotted knapweed | <i>Centaurea maculosa</i> |
| 5. Diffuse knapweed | <i>Centaurea diffusa</i> |
| 6. Salt Cedar | <i>Tamarix ramosissima</i> |
| 7. Yellow starthistle | <i>Centaurea solstitialis</i> |
| 8. Perennial pepperweed | <i>Lepidium latifolium</i> |
| 9. Purple loosestrife | <i>Lyrum salicaria</i> |
| 10. Black henbane | <i>Hyoscyamus niger</i> |
| 11. Jointed goatgrass | <i>Aegilops cylindrica</i> |
| 12. Buffalobur | <i>Solanum rostratum</i> |
| 13. Japanese knotweed | <i>Polygonum cuspidatum</i> |
| 14. Scotch Thistle | <i>Onopordum acanthium</i> |
| 15. Yellowflag iris | <i>Iris pseudacorus</i> |
| 16. Whitetop | <i>Lepidium draba</i> |

Whitetop is listed as an “A” weed in designated areas of the County. Pine Valley, Baker Valley, Ebell Creek, Sutton Creek, and Bowen Valley/Sumpter areas are Mandatory Control. Contact Baker County Weed Control for specific information at 541-523-0618.

“B” Designated Weeds – Widespread and/or of High Concern

- | | |
|------------------------|-----------------------------------|
| 1. Whitetop | <i>Lepidium draba</i> |
| 2. Canada thistle | <i>Cirsium vulgare</i> |
| 3. Venice mallow | <i>Hibiscus trionum</i> |
| 4. Yellow toadflax | <i>Linaria vulgaris</i> |
| 5. Dodder | <i>Cuscuta campestris</i> |
| 6. Chickory | <i>Cichorium intybus</i> |
| 7. Teasel | <i>Dipsacus fullonum</i> |
| 8. Common Tansy | <i>Tanacetum vulgare</i> |
| 9. Klamathweed | <i>Hypericum perforatum</i> |
| 10. Puncturevine | <i>Tribulus terrestris</i> |
| 11. Myrtle spurge | <i>Euphorbia myrsinites</i> |
| 12. Sulfur cinquefoil | <i>Potentilla recta</i> |
| 13. Ventenata | <i>Ventenata dubia</i> |
| 14. Tree of Heaven | <i>Ailanthus altissima</i> |
| 15. Russian olive | <i>Elaeagnus angustifolia</i> |
| 16. Oxeye daisy | <i>Leucanthemum vulgare</i> |
| 17. Dalmation toadflax | <i>Linaria dalmatica</i> |
| 18. Medusahead rye | <i>Taeniatherum caput-medusae</i> |
| 19. Russian knapweed | <i>Rhaponticum repens</i> |
| 20. Bur Buttercup | <i>Ranunculus testiculatus</i> |
| 21. Dalmation Toadflax | <i>Linaria dalmatica</i> |

NOTE!: Whitetop is a “B” weed in all other areas of the County not listed in the above section.

**COPIES HAVE BEEN SENT TO THE FOLLOWING
USDA Mailing List**

Wallowa-Whitman National Forest Tom Montoya, Forest Supervisor 1550 Dewey Ave., Suite A Baker City, OR 97814 tmontoya@fs.fed.us	USDA Forest Service Pacific Northwest Region 6 Glenn Casamassa, Region 6 Forester PO Box 3623 Portland, OR 97204 gcasamassa@fs.fed.us
Wallowa-Whitman National Forest Kendall Cikanek, District Supervisor 1550 Dewey Ave., Suite A Baker City, OR 97814 kcikanek@fs.fed.us	Vicki Christiansen Chief, USDA Forest Service 1400 Independence Ave., SW Washington, DC 20250-1111
United States Department of Agriculture Forest Service Chris French, Associate Deputy Chief 201 14th St., SW, Suite 5NW Mailstop 1106 Washington, D.C. 20250 cfrench@fs.fed.us	U.S. Department of Agriculture The Honorable Sonny Perdue Secretary of Agriculture 1400 Independence Ave., SW Washington, D.C. 20250
The President The White House 1600 Pennsylvania Ave., NW Washington, D.C. 20500	U.S. Department of Justice Attorney General 950 Pennsylvania Ave., NW Washington, D.C. 20530
Representative Greg Walden 2185 Rayburn House Office Bldg. Washington, D.C. 20515 tucker.billman@mail.house.gov	Senator Ron Wyden 221 Dirksen Senate Office Bldg. Washington, D.C. 20510 kathleen_cathey@wyden.senate.gov
Senator Jeff Merkley 313 Hart Senate Office Bldg. Washington D.C. 20510 jessica_keys@merkley.senate.gov	Office of the Governor Jason Miner, Nat. Res. Policy Mgr. 900 Court St., NE, Ste 254 Salem, OR 97301 Jason.Miner@oregon.gov
Representative Lynn Findley 900 Court St., NE, H-475 Salem, OR 97301 rep.lynnfindley@oregonlegislature.gov	Representative Greg Barreto 900 Court St., NE, H-384 Salem, OR 97301 rep.gregbarreto@oregonlegislature.gov

Senator Cliff Bentz 900 Court St., NE, S-301 Salem, OR 97301 sen.cliffbentz@oregonlegislature.gov	Representative Greg Smith 900 Court St., NE, H-482 Salem, OR 97301 rep.gregsmith@oregonlegislature.gov
Jonathan Shuffield Assoc. Legislative Director for Public Land and the Western Interstate Region JSuffield@naco.org	Jeff Small Executive Director Congressional Western Caucus 2057 Rayburn HOB Washington, DC 20515 jeff.small@mail.house.gov
Baker County Natural Resources Advisory Committee Members	Baker County Board of Commissioners 1995 Third St Baker City, OR 97814