

October 7, 2019

Attn: Tom Montoya, Forest Supervisor
Wallowa-Whitman National Forest
1550 Dewey Ave Baker City, OR 97814

Dear Reviewing Officer:

Pursuant to 36 CFR 218, Greater Hells Canyon Council (GHCC) submits the following objections to the Two Eagle Vegetation Management Project Environmental Assessment (EA) and Draft Decision Notice (DN). This objection is filed pursuant to issues raised in GHCC's December 19, 2017 scoping comments on the proposed action for the project. The Responsible Official for the project is Bill Gamble, La Grande District Ranger.

The 7,206 acre Two Eagle project area is located 20 miles southeast of Union, Oregon and shares its eastern boundary with the Eagle Cap Wilderness. The entire project area is on National Forest System lands of the Wallowa-Whitman National Forest within Baker County and has a legal location of Township 6 South, Range 43 East. The project area spans West Eagle Creek, Upper Eagle creek, and Bennett Creek-Eagle Creek subwatersheds of the Eagle Creek watershed. A portion of the Eagle Creek Wild and Scenic River Corridor is included in the project boundary where numerous developed recreation facilities are located.

The Draft DN would implement Alternative 2M and approve actions including:

- 1,869 commercial logging and 707 acres of non-commercial logging including treatments in the Boulder Park Roadless Area producing 7 million board feet of saw and non-saw material.
- 6,369 acres of prescribed burning is proposed within the area implemented over the next 10 years including 928 acres of jackpot burning, 1,569 acres of pile burning, and 3,872 acres of natural fuels burn blocks.
- 17.03 miles of road reconstruction/maintenance including 15.33 miles of road maintenance to re-open roads that have grown closed.
- 5.25 miles of temporary road construction to facilitate logging.
- 11.06 miles of roads would be decommissioned and removed from the transportation system.
- Whitebark pine and meadow restoration, campsite improvement, and Mule deer and fish habitat improvement.

GHCC is a non-profit organization based in La Grande, Oregon that represents over 1000 members and supporters. GHCC has worked to monitor and protect the Wallowa-Whitman National Forest for over 50 years. GHCC is committed to the protection and restoration of forest conditions and wildlife habitat throughout the Greater Hells Canyon Region and actively participates in Forest Service proceedings and decisions concerning the management of public lands within the Wallowa-Whitman Forest. Members and staff of GHCC live in the communities surrounding the Wallowa-Whitman National Forest, and use the forest extensively for recreation, viewing wildlife and wildflowers, municipal water, hunting, fishing, overall aesthetic enjoyment, and other purposes.

Statement of Objections

We appreciate many aspects of this project that are contained in Alternative 2M including: various activities addressing user built roads and unauthorized use on closed roads that are causing resource damage, decommissioning of duplicate and unneeded roads, reconstruction of needed roads that are causing resource damage, Whitebark pine restoration, meadow restoration, Interpretive Site creation, campsite improvement, Mule deer habitat improvement and fish habitat improvement. However, we believe that Alternative 3, with some modifications, is a better balanced project that would meet the goals of the project while addressing key concerns.

Specifically, we object to the reduction in the quality of connectivity corridors across 126 acres that is included in all action alternatives. Management activities in connectivity corridors under all alternatives will reduce the canopy closure and structural complexity in these corridors resulting in direct, indirect and cumulative impacts to wildlife habitat. We ask that Alternative 3 be adopted and the logging within connectivity corridors be dropped from the project. Alternative 3 does not include Whitebark pine restoration activities. Removal of competing conifers adjacent to Whitebark pine that would be advantageous for the trees and seedlings should be included in Alternative 3 if the Whitebark pines identified are outside of connectivity corridors.

Thanks for consideration of these objections to the Two Eagle project. We appreciate the Wallowa-Whitman's commitment to thoughtful stewardship of our public lands.



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