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Comments: Calapooya Timber Sale

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Umpqua National Forest

Cottage Grove Ranger District

April 19, 2018

Re: Calapooya TS Objection

Dear Forest Service Staff,

I would like to take issue with your suggested Alternative for the Calapooya Timber Sale. There are several important issues that you have not significantly addressed as to the harm that some of your proposed actions would have on various wildlife species, and other inadvertent impacts. My chief wildlife concerns center around the disturbances and impacts that such cutting might have on Endangered Species and on the Calapooya Elk Herd, which has been documented to be as large as 500 head.

For instance, you say in your EA that "the actions proposed in Alternative 2 & 3 do not directly benefit winter range management areas: - and I wonder if that actually means they would indeed have negative effects on Elk Winter Range!

The miles long burn you propose along the very top of the eastern portion of the Calapooya Divide is especially worrisome. Apparently you are doing it to help any future fire lines. And while it is true that we are experiencing more frequent fires these days of global warming, it is also true that historical observations of previous fires has shown that young second growth trees burn like matches, and that's what you would be creating for 20-30 years! Rather, leave the existing older trees in place that are left along the Divide, because it's been proven that older trees with their thick barks are more resistant to fire, fires can actually burn around or through old growth and not create an intense fire.

One very important consideration is that by clearing trees from hundreds of feet along the ridgeline, you will be opening the vistas and INCREASE PUBLIC INTEREST AND ACCESS along this extremely Narrow road (

Which is only like 10-12 feet across in places!) The reason the road is so narrow, is that literally there is only that much FLAT GROUND to make a road or path on. The terrain falls off very steeply both north and south of the Divide.

And where this now-small narrow road leads to is very important. On a Landscape Scale, the juncture of the Calapooya Divide and the Willamette High Divide is a crucial piece of land. Each Divide is very narrow, but the Calapooya is much smaller and more narrow. This makes it more dangerous for motorized vehicles and much more valuable for Elk! The two Divides are important because they literally afford the ONLY flat terrain in miles and also they have invaluable water sources along them -both things that Elk must have. (If you try walking down the north-facing slope where you are proposing to cut trees, you would soon find out why these rare flat areas are so very valuable to Elk! All the rest of the terrain is rocky and astounding Steep!) And the position of the Calapooya Divide is of paramount importance to the Calapooya Elk Herd because it is the only viable way to reach the larger Willamette Divide from the extensive old growth refuge the Elk find in Canton Creek, an area that ODFW should give "Priority Status" to, since it is the largest ungulate refugia along the Calapooya Divide.

INTERFOREST CONSULTATION/IMPACTS

Your sale's easternmost units are at the extreme eastern edge of your Ranger District, and as such any Elk herd disturbances that might impact the Rigdon District's same Calapooya Elk Herd, calls into play your own 'Cumulative Impacts' doctrine; such that you are not suppose to let Herb Wick hit the Elk habitat hard on Rigdon's side of the line, - and then you go and hit the CRITICAL WILDLIFE CONNECTIVITY CORRIDORS on your side of the line - that equals a double-whammy to ungulate populations! And Mr.Wick hit his side of that line very hard, twenty or thirty years ago, such that now most of it is useless 20-30 yr old second growth that the Elk can barely penetrate, and rarely use.

-This references "Connected Actions" that are similar geography or location. As I understand it, at a bare minimum you are required to include any pertinent adjacent conditions on other Ranger Districts; especially when dealing with the habitat requirement of large mammals with large home ranges and that need critical CONNECTIVE CORRIDORS to mate and find adequate food and shelter.

For instance, the ODFW has documented that Rigdon's Staley, Coal and Packard Creeks are especially valuable elk habitat and they lie immediately East of the Calapooya Divide.

Your proposal says it looked only at Sharps, Brice and Upper Steamboat subwatersheds in accessing any 'direct or indirect effects on big game".

I would like to suggest that you were remiss in using the "5th Field HUC drainage" to evaluate your sale impacts; when it comes to Elk movement corridors they almost always go from one drainage to the NEXT drainage. So, it seems only logical that if you care about Elk, you must needs address things on a larger Landscape Scale.

When you then look at the larger perspective, you can see that where the Calapooya Divide intersects the Calapooya Mountain ridgeline it is a major travel corridor between important winter and summer habitats in both the Rigdon and Cottage Grove Ranger Districts. It is very valuable in a Diversity sense in that it constitutes a

connective linkage between the Klamath to the East, the Umpqua on the South and West along the Calapooya Divide -all the way to Interstate 5! It is especially diverse because it over laps major Ecozones on both sides of the Divide.

For instance, the No. Umpqua's older 'Mayflower Timber Sale' that would've been immediately south of your Calapooya burn road (Had it not been halted, due to multiple "unsuitability") proves cogent comment on your proximate sale proposal. The EA documented that this area was an important connector link between Boulder Creek/Canton wildlife block and points South, East and West. It also mentions that this area has an important " Elk Calving Area" in Section 22, where FS 2213 connects to FS 767 - right where you are proposing to cut and burn trees! The biologist described this juncture as being even more crucial because of the "important open wet meadows that dot the ridgelines here."

I might mention that the same EA documented that fire damage had already "reduced hiding and thermal cover options for ungulates." And it further notes:

*** "Timber Harvest activities in this area could further add to the shortage of useful cover."

And in general, these days unfortunately the Cascade Elk Herds are not doing very well; biologists tell me that it's because "they can't find any groceries" - enough high quality forage for their critical winter Energy Budget, which directly impacts fertility rates and herd health.

Access to high quality forage and water sources are critical for healthy Elk herds. These attributes are found all along the Calapooya Divide and in the Lemolo/Bradley Lakes area, where several high mountain meadows and lakes are found. Elk seek to minimize Energy Expenditures and maximize forage opportunities, and this is exactly what that important area on the Willamette Divide offers all types of wildlife. And it is all the more important that it easily connects to the Timpaganos area, just a few miles south of where the Calapooya Divide abuts the Willamette Divide.

This Timpaganos Lakes area was proposed as a roadless area at one time and still offers exceptionally diverse habitats for both flora and fauna. It is one of the Priority areas for Elk since the relatively roadless nature of this extremely steep area offers some rare security for Elk and deer. It is worth noting that studies in the Oregon Coast proved that when ungulates are protected behind locked gates and vehicles kept out that elk herd are in better shape with smaller home ranges around their preferred habitats, which resulted in much better reproduction and calf survival. (Cole1996) In fact, Lyon etal (1985) found that when forest roads were open "and offered legal and illegal hunters direct access to elk herds, it can result in a complete lack of calving." Both authors end by recommending Road Closures to enhance elk habitat.

I would recommend that not only should you refrain from cutting along the Divide, that in order to protect this invaluable migratory connection for Elk, you should just Close that whole eastern extension of FS Road 767, to preclude detrimental access, especially in winter.

Elk prefer old growth in both Summer and Winter (warmer in winter; cooler in Summer) De Colesta and Witmer documented that both Winter and Summer range is critical to healthy herds. "If given their preference, elk would avoid steep terrain, and prefer gently sloping south-facing benches very close to permanent water sources. They rarely travel more than 200 feet into any clear-cuts."

Being able to access reliable water sources is difficult for elk, since riparian areas are usually the first to be

roaded and logged. So, these upper elevational mountain lakes like in the Lemolo/Timpangos Lakes are rare, relatively roadless areas are of invaluable importance to the Calapooya Divide Connective Corridor and the larger Willamette Divide.

The Willamette High Divide is open to traffic and accessible to even snow mobiles in the winter time. And if it's one thing we have learned from studying Elk (Wisdom etal, [hellip]adnauseum) - they are afraid of motorized vehicles and RUN AWAY [hellip]sometimes their fear can drive them a very long way. (The old Rigdon Biologist Ken Kesner told me that one day, one of the elk they collared at the lower end of the Willamette, got so scared at the sound of motors and shooting that it ran all the way across the Cascades, over into the Deschutes National Forest!)

RARE PLANTS-no Inventory of Umqua Gentium (Frasera Umpquaensis)

Another concern is that you have not sufficiently taken into account the rare plant, Umpqua Gentium that only grows on cool, north facing slopes (relatively rare in the Cascades, as most trend Northwesterly.) I alerted FS staff last fall about the documentation that this sensitive plant grows along the Divide, but as far as I know, no one has looked for the rare once-every-four years bloom of this very rare plant. It was identified as a candidate for protective designation over a decade ago. It's northern populations are only found along the Calapooya and Willamette Divides, as most populations are confined to the Rogue area.

So, our northernmost populations are the climatic extremes that the plant can endure, as such populations use to be found further north, but now the only existing known plants this far north are in the areas around the Divide.

It's importance has been documented by the Corvallis-based 'Institute for Applied Ecology", as well as the BLM. They have done ground-breaking research along the Calapooya Divide and found several populations of the Umpqua Gentium at Sourgrass Mountain, Elk Meadows, Nevergo and Elk Camp Shelter.

This rare plant may have the potential to document the advent of global climate change in our whole region! The reason is that it is a very long lived plant - up to 80 years! (Kaye, 2001) It is this plants unique longevity that makes it so susceptible to any variety of environmental changes, including "disturbance periodicity, canopy closure, and forest community composition; as well as short and long term climate cycles". They noted that their research documents "Most importantly, that the average winter temperature has been affected by changes in our climate."

The Institute's research found that "some of the most common causes of population decline are habitat destruction, genetic isolation and low recruitment rates." These all follow from the destruction of a forest.

UNSUITABILITY OF SOILS

The reason so many of your harvest units in both the Calapooya and Quartz sales are being removed by helicopter is due to the exceptionally STEEP nature of the terrain hereabout.

For instance years ago, the No. Umpqua RD proposed sales immediately south of the Calapooya Divide on their side of the ridge - but they were CANCELED due to silvacultural concerns expressed by the Ranger and Silvaculturist, and it was documented in that old "Calapooya EA" that it was just too steep and rocky to be considered suitability for timber extraction. Further, it documents some of the steepest places immediately south of your sale area notes headwalls with "100% steepness"! The staff noted "'70-100%" steepness was common in the area with broken and very rocky soils." They wrote that on one of the previous cuts there now was a "Steep headwall road that caused an existing 1000 yard landslide."

In a letter about these sales, Ranger Steve Gadd wrote to Steve Anderson about the concerns he had about the unstable soils there. He described the topography as having "Very large slump zones."

Their Soils Scientist, Dale Paulson noted that some of the units "had soils on and adjacent to the units that indicate unstable soil characteristics. He notes two different types of unstable soil: "One area has steep, very shallow soild with rock cliffs. Slope gradients range from 75 to 100". He additionally added that there are "slumps, vertical cliffs, signs of active shallow failures and areas of severe ravel exist." He also documented active rotational slumping with very unstable conditions, with "two existing large failure sites".

-And on a silvacultural note: Paulson also wrote "UNPLANTABLE SOILS due to very shallow (C12) soils and exposed rocks."

The upshot of their rejection of the Mayflower Sale was that "The two unstable sites should be classified as UNSUITABLE - due to IRREVERSIBLE SOIL DAMAGE." In addition he said they fall under the classifications of 'TLA' and 'TLS' because of the imminent Landslide Risk, along with risks of slumping and earthflows.

-Can your side of the Calapooya Divide be so different?

FLYING SQUIRRELS AND RED VOLES - INVALUABLE FOOD FOR ENDANGERED OWL

I have heard that you are dismissing the deaths of voles as only having a minor impact on Spotted Owls, but this is not true.

Research has shown that in Oregon, the owls major prey are red tree voles (Forsman, Vol. 38, No. 3 p. 222) "In the Cascades, there is a 'higher percentage of red-backed voles in owl diets". While it may be true the Wood Rats are the dominant food in California and Eastern Oregon, here the owls "showed spatial and temporal variations in prey" In other words, there are more voles here than wood rats, so in our location a major part of their diet is TREE VOLES! Researchers also noted that the owls other chief prey, flying squirrels and woodrats suffer from sudden population declines and fluctuations in their numbers; so perhaps our tree voles have proven a more accessible and consistent food source - please do NOT destroy the chief food source for any owls!

You admit that your logging and even your underbrush removal in units will have a LETHAL EFFECT ON VOLES. The Forest Service would be inviting a law suit if you so blatently destroy the main food source of the endangered Spotted Owl.

And important factor in the Owls decline that you have not sufficiently addressed is the advent of an onslaught of Barred Owls that are driving Spotted Owls out of their own habitats, and they are coming to national forest lands from the private lands, because Barred Owls are omnivorous eaters!

So, you must take into account both the current assaults being raised by a Barred Owl invasion from the west, and the threat of more fires from the east! Now your sales are taking some of the very last of the large trees that the owl needs to reproduce - the Forest Service should NOT be cutting the trees out from under an Endangered Species, all the while killing off their major source of FOOD!

Forest Service regulations say: "Any management activity that will negatively affect plant or animal species listed on the Regional Forester's Sensitive Species List (USDA 2015) or their habitat will be modified" you are directed to "either avoid (preferable)or minimize the impact." And further, "Activities will not be permitted if they will result in the loss of a colony or subpopulation that is important in the natural distribution of the species."

I believe destroying a major Wildlife Connectivity Corridor and Refugia may constitute an 'important natural distributions of Elk and Owls.

BIODIVERSITY CAN NOT BE REPLACED[hellip]

In ending, I would like to bring up that in looking at the Landscape value of the large block of older trees that are centered both east and west of the Noonday Trail, the present INTACT Nature (relatively speaking) of these mostly contiguous roadless blocks is their current LACK OF FRAGMENTATION; which is invaluable! The deleterious effects of Edge habitat are well documented, so I am making a plea that you please back out of all the current older stands and do not create more fragmentation -we have enough 'Edges', especially when you consider all the O&C lands and private lands immediately west of your proposed sales!

The value of large contiguous blocks of relatively unfragmented habitat grows with each passing year, as evidenced by scientist documenting the rapid spread of Global Warming. If we want Oregon's invaluable forests to survive another 100 years, instead of cutting our trees, bit by bit - why not SAVE OUR FEDERAL LANDS by creating a valuable 'CARBON SINK' of older trees. Our forests are our chief line of defense against a warming climate - water shortages are already rampant!

Please seek the higher value for our forests, they are not just money-making 2x4s and 4x4s; they could be the key to maintaining our healthy environment. Federal lands should prioritize protecting intact forests, you can go cut some of all of those 'second growth' trees we see so much of - besides, it is all those immature plantations that go up in flames so intensely - leave the forest protect itself by leaving it alone - you have already cut most off of this drainage, please leave the intact habitat alone.

As further proof on my concerns, it seems your staff has only a tiny fraction of the logging will be done in a conventional manner - with the rest needing the expensive Helicopter logging and yarding up super steep slopes!

In summary, I believe that this project would have a measureable negative impact on the population viability of deer and elk on both the Willamette and Umpqua National Forest.

Law enforcement officers have told me that there is already a very bad POACHING problem in this remote area; and opening up major road improvements that would encourage increased traffic and public access of these remote lands in the Bohemia area, will only exascerbate a backwoods linkup to the Willamette drainage by OFFROAD VEHICLES and SNOWMOBILES.

As an example of previous problems in this area, a few years ago the elk herd grazing near the Willamette was slaughtered enmass by gun enthusiasts with high powered weapons!

Thank you for your consideration,

Catherine Koehn