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Commission Chair

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Brandon Houck; Heppner District Ranger

c/o Leslie Taylor.

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Electronically submitted: [middot]<https://www.fs.usda.gov/project/?project=41350>
January 7, 2019 [middot]

Dear Mr. Houck,

Baker County appreciates the opportunity to provide input into the "Notice of Intent to Prepare and Environmental Impact Statement" in regards to the Ellis Integrated Vegetation Management Project.

The County supports the interdisciplinary approach to forest management and encourages the Forest Service to use any, and all, scientific supported methods to achieve ecosystem health. The County [middot] looks forward to the treatment details that will come out with [middot] the EIS, however, in general, the project appears to be developed with multiple use, the socio-economics of the affected counties in mind, as well as working towards a healthier forest ecosystem .

Baker County welcomes discussions through the Coordination process.

Increase Forest Health and Vigor;

Baker County supports forest treatments, including logging, for dry and cold forests and applauds that the Forest Service -is preparing separate treatments suited ' to the stand type. Treatments including harvest(loggi~g) to appropriate basal areas in the distinct forest types as well as small diameter thinning and prescribed burning will all contribute to forest health by reducing stand density, competition for sunlight and water, and help in the control of diseases' and pests. Additionally, logging is a direct benefit to local economies on both the direct and indirect levels.

The County is especially supportive of the firewood and post and pole cutting for personal and commercial uses. This is an excellent way to not only reduce stand density by removing small diameter trees, understory, dead, or down trees, but it acknowledges and encourages local economies, their customs and culture.

Enhance Shrub-steppes, Meadows, and Other Unique Vegetative Communities:

The Forest Service's approach to enhancing and restoring aspen stands is well thought out and scientifically sound. However, Baker County encourages the use of natural barriers, large wood buffers or fences to surround treated areas as ungulates, especially elk, and livestock will decimate small diameter aspen trees if allowed. The exclusion of water sources to the outside of the aspen enclosures is a

welcome approach in lieu of removing access to allotments - thank you.

Improve Wildlife Habitat:

Baker County approves of habitat improvement that will benefit multiple species.

The concept of creating mosaic forests seems to promote the opportunities for , wildlife 'security (hiding), forage improvement through reduced canopy, but most , importantly provide[middot] for a more 'natural' Forest Structure of diverse age trees from seedlings to downed logs. [middot]

Proposed Road Closures:

Baker County has a no net loss of roads policy. "Specifically, there will be no net loss to access." (BCNP 2016, pg 18) Access, is critical and necessary not only to maintain the mandate of multiple use, but also for emergency entry for fire control . . and human rescue.

[middot] Baker County does not support habitat modifications based on single species, preferring a healthy ecosystem that provides habitats for diversity of species. ' , .

Baker County believes that the Forest Service is using the excuse of "elk security" to close more roads[middot] and reduce access to public lands. The County encourages the Forest Service to use time-tested, science-based methods for diverse wildlife habitat.

It is unclear why elk have become such an obsession with the Forest Service. 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:

[bull] 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 suggest, other studies have shown that quality forage and cover are just as much, or even more, important.

[bull] Elk numbers in Oregon have increased over the last several years in most locations, The increase happened without closing roads.

[bull] Elk distribution is a problem. Private land owners that do not allow hunting give elk a 'safe' place to stay .. Unfortunately, some of these private land owners are also the first to complain that elk have destroyed their fences and haystacks.

[bull] 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.

[bull] Hunting economically benefits communities both directly and indirectly. Direct benefits such as the purchase of hunting specific items (licenses, guns, ammo, etc.), and indirectly through the sale of, other necessary outdoor equipment like, clothing, shelter, food, hotels, and travel needs.

[bull] The life cycle, feeding habits, calving habits, and everything else that goes into what makes an elk are not representative, or duplicative, to forest [middot] 'dwelling[middot] mammals as a whole. For example, elk eat a diet primarily of grasses, some forbs, and only minimally consume tree lichen and shrubs whereas deer rely on browsing shrubs with a smaller consumption of

grasses and forbs. Young aspen with a diameter of less than 2cm are especially vulnerable to herbivory of elk and deer. This will affect the restoration of aspen stands. Elk may not be the best healthy ecosystem - indicator species.

[bull] 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 "security" zone placement.

[bull] Studies have shown that trails used by hikers, bikers, and horses also have effects on elk movement to a somewhat lesser degree, however, the Forest Service does not ever close trails or discourage non-vehicular use.

"Thus, 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 a public and private land . . . matrix. Journal of Wildlife Management 77:514-524)

Improve Quality of Rangelands:

Baker County supports the maintenance of water developments using equipment appropriate to the job. In addition, the County recommends that livestock management also include activities such as locating salt away from water sources and frequent livestock observation and relocation within the allotment by the producer or hired range rider.

The County supports installation of a pasture fence and recommends that the Forest Service incorporate 'wildlife friendly' fencing techniques accepted by NRCS. Easements must be agreed upon by the private land owner and the Forest Service.

Improve and Maintain Recreational Infrastructures:

The County supports activities that increase the public's use of federally managed land.

Reduce the Risk of Undesirable Wildfire:

Baker County supports and encourages aggressive fuels reduction treatments including a comprehensive approach to working with private landowners within the WUI zones.

While the idea of restoring the forest system to closely match historical structure, function, diversity, and dynamics is admirable, the Forest Service must acknowledge that changes in the forest have occurred, and it is not possible to return to pure historical systems. The County suggests utilizing a more adaptive management approach that does not make historical structure a priority; but rather focuses on promoting healthy ecosystems that reflect the change in vegetation, treating noxious weeds and invasive species, and overall multiple uses of the land. It is also imperative that the Forest Service follow the 1906 law that requires the forests to be used for timber production. [middot]

Improve Ingress and Egress Corridors:

The County wants to commend the Forest Service on the inclusion of roadside fuel treatments, removal of hazard trees, and creation of buffer zones to a depth of 300' -500', and other techniques to provide a safer road environment for

emergency personnel and evacuation of forest users. Not only do these activities benefit the above emergency access issues, it promotes the forests for public access for culturally significant uses such as scenic views, family picnics, subsistence gathering, and many other activities. This is truly an exceptional activity that crosses all boundaries of safety, health and welfare of public land users.

In conclusion, Baker County found the overall premise of this project to be a refreshing approach to forest management. It proposes common sense activities and maintains the multiple use mandate. The inclusion of road closures and elk security are subjects for additional discussions. The County looks forward to the Draft EIS.

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, Chairman
Baker County Commission