

Data Submitted (UTC 11): 10/1/2021 7:47:12 PM

First name: Brian

Last name: Kelly

Organization:

Title:

Comments: October 1, 2021

Via: US Forest Service project website electronic comments link

Bill Gamble, District Ranger

La Grande Ranger District

Wallowa-Whitman National Forest

3502 Highway 30

La Grande, OR 97850

Greater Hells Canyon Council Comments on the Sheep Creek Vegetation Management Project Preliminary Environmental Assessment

Dear Bill,

I am writing on behalf of the Greater Hells Canyon Council (GHCC) to provide comments on the Preliminary Environmental Assessment for the Sheep Creek Vegetation Management project.

GHCC is a non-profit conservation organization based in La Grande. Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations. GHCC actively participates in Forest Service proceedings and decisions concerning the management of public land within the Wallowa-Whitman National Forest. We are an "interested public" for timber sales.

Introduction

We've tracked the development of the Sheep Creek project along with other members of the public. We really appreciate the efforts of the Forest Service to keep the public informed about the project. Thank you for the considerable efforts of the entire Forest Service staff involved with developing this project, leading field trips, answering questions, holding an open house, and otherwise keeping the public informed about the process.

We're pleased to provide these comments on the Sheep Creek project.

The Preliminary Environmental Assessment (EA)

The area being evaluated for the Sheep Creek project consists of approximately 29,953 acres within the Chicken Creek and Sheep Creek sub-watersheds. The planning area is located in Union County about 22 miles southwest of La Grande. It encompasses a portion of the Blue Springs Wildland Urban Interface Area and the Winom Frazier OHV (off highway vehicle) trail network.

The Key Issues

During Scoping, the Forest Service identified six key issues and subsequently used them to develop a range of alternatives. The key issues identified by the Forest Service are:

Treatments in Old Forest and Moist Forest

Treatment in Riparian Habitat Conservation Areas

Potential Fire Behavior

Economics

Access

Connectivity (of wildlife habitat and permeability for animal movement both within and outside of the project area).

The Alternatives

The Forest Service EA developed and analyzed three Alternatives in order to address these key issues:

"No Action" Alternative (Alternative 1)

"Proposed Action" (Alternative 2)

"Reduced Action (Alternative 3)

Actions Common to Alternatives 2 and 3

"Actions Common to Alternatives 2 and 3" (as stated in the Preliminary EA) include:

Treatments are focused on previously managed stands

Treatments are located adjacent to existing open and closed roads for unit access

Units have soil types and topographic positions that are likely to experience droughty conditions into the future

Treatments are proposed within fire regime condition class 2 or 3

Management strategies in dry pine dominated forests benefit dry and moist mixed conifer forest

Dry forest management actions support habitat conservation strategies

"Commercial Activities" (as stated in the Preliminary EA) include:

Commercial Thinning (HTH)

Improvement Thinning (HIM)

Patch Openings (HPO)---irregularly shaped, three to five acres, in Stem Exclusion and Understory Reinitiation stands retaining western larch, Douglas-fir, ponderosa pine, and trees suitable for snag recruitment within the openings

"Non-Commercial Fuels Reduction and Vegetation Management Treatments" (as stated in the Preliminary EA) include:

Mechanical Thinning (FUM) and Hand Thinning (FUH)

Pre-Commercial Thinning (PCT)

Riparian Habitat Conservation Area (RHCA) Project Design Criteria---limited to non-commercial hand thinning of trees up to 9 inches dbh, hand-piling of slash limited to piles 4 foot high and 6 feet diameter, hand burning, and no treatment buffers ranging from 50 to 100 feet directly adjacent to stream channels

RHCA-Wetland Enhancement---to promote native riparian vegetation on the open meadow adjacent to Sheep Creek; cutting lodgepole pine and grand fir <12 inch dbh and 50 feet or farther from streambank; retaining western larch, Engelmann spruce, ponderosa pine, Douglas-fir, and native hardwoods; leaving cut trees on site for ecological purposes; reducing excess debris through hand-piling and burning, placing in streams, or left on site; fencing around meadows; and planting broadleaf vegetation

"Post Sale Road Management Plan" (as stated in the Preliminary EA) includes:

Closing 3.45 miles of road

Decommissioning 0.16 miles of road

Implementing existing management direction for roads related to the Rooster Project

"Opportunities for Enhancement" (as stated in the Preliminary EA) describing expansion of the Winom-Frazier OHV trail system:

Formalizing existing ATV routes for 6.3 miles

Designating new OHV routes along 6.98 miles of closed roads

Creating and posting maps at access points and intersections

Alternative 2

Alternative 2 /the Modified Proposed Action also includes:

A Forest Plan Amendment to use ground based logging equipment on slopes steeper than 30% ("tethered logging") requiring an amendment to the Wallowa-Whitman National Forest Land and Resource Management Plan

Two aged Shelterwood Establishment and Removal Cut (HSH) for forests affected by Armillaria root disease with potential for whole tree extraction for use in nearby stream restoration projects

Commercial Thinning (HTH)---in dry Old Forest Multi Stratum (OFMS) stands to convert to a single story forest stand (HTH-OFSS) and thinning to upper management zone (HTH-UMZ) to contribute to large tree development
RHCA-HTH Riparian Thinning---removing trees up to 50 feet around broadleaf and early seral conifer species by

hand or commercially by equipment limited to existing roadbeds utilizing total suspension of trees

Alternative 3

Alternative 3:

Was developed in response to three of the key issues--- treatments in OFMS; treatments in RHCAs; and habitat connectivity

Reduces total acres of treatment

Eliminates prescriptions that remove the highest basal area, commercial treatments in RHCAs, and commercial treatments in connectivity corridors

No Forest Plan Amendment is required

DETAILED COMMENTS FROM GREATER HELLS CANYON COUNCIL

Introduction and the East Face Model

GHCC appreciates the careful consideration that went into designing the Sheep Creek Project. In particular, we appreciate the analysis done regarding wildlife habitat connectivity, riparian areas, large and old trees and forests, soils, and elk habitat.

We encourage the Forest Service to adopt a similar path for the Sheep Project to that taken on the East Face Project. The La Grande Ranger District staff did a great job on the East Face project, and elements of that success can be adapted to the Sheep Project.

The East Face Project successfully met ecological, social, and economic goals while protecting forests important for wildlife habitat connectivity. Fuel reduction treatments were located strategically. Silvicultural prescriptions focused on ecological forest restoration responding to the effects of past logging and fire-suppression. Significant amounts of commercial timber were logged without excessive impacts to the most ecologically sensitive areas. The largest and most fire-resistant trees were protected. The road system was managed to reduce negative impacts while maintaining public access. Elk habitat requirements were carefully analyzed and treatments were designed to improve elk habitat. No amendments to the Forest Plan were required. The Forest Service worked with a number of diverse agencies and members of the public to get this done. The Wallowa-Whitman National Forest and the La Grande Ranger District achieved remarkable results on the East Face Project. We believe the Sheep Project provides the opportunity for similar successes.

The East Face Project can be used as the basis of an adaptive management strategy for the Sheep Project. We feel this would be a good way to achieve the relationship-building and learning goals described in Purpose and Need statement #6 described in the Scoping letter for the Sheep Project.

We must emphasize that we also have some concerns about some aspects of the Sheep Project. We've done our best to describe them for you below.

We look forward to working with you as you develop the final EA to resolve some of these issues and make this a stronger project.

Thank you for the opportunity to provide these comments.

Silviculture and Fuels/ Vegetation Management Treatments

We very much appreciate and support some of the criteria used by the Forest Service to identify areas proposed for treatment including:

"Treatment area occurs on previously managed stands. Most proposed action treatments occur within a stand that has been previously commercially harvested or non-commercially harvest and/or a fuels reduction treatment. Units that appear to have no previous management have large diameter stumps throughout the unit indicating management that was not recorded by the Forest Service."

"Treatment areas are adjacent to existing open and closed roads for unit access. No specified roads will be required to implement the proposed action. Utilizing current open roads, opening closed roads, and constructing temporary roads will adequately provide access to the proposed actions. Proposed management unit's proximity to a major road prevent these areas from functioning as satisfactory security or forage habitat for big game species; and treatment would not change this. In addition, these stands are at an elevated risk to fire ignition due to their proximity of heavily-used 3-season roads compared to other areas within the project area."

We also generally support aspects of the Forest Service strategic approach to fuel reduction treatments using potential wildland fire operational delineations (PODs), potential control lines (PCL), and defensive fuels profile zones (DFPZs).

We're supportive of the approach stated in the Forest Service fuels report, "Potential control lines would be identified and reinforced with fuels reduction treatments anchored into the existing road system and reinforced by natural barriers, wildfire scars, and/or past vegetative treatments. These treatments would not be designed to stop a wildfire by themselves but would provide suppression forces a higher probability of successfully attacking a wildfire with indirect suppression tactics such as "burn outs". These fuels breaks would be utilized to limit fire size by compartmentalizing the project area and creating PODs. Compartmentalization of the project area would increase opportunities for future planned and unplanned fire."

We believe that fuel-reduction treatments are most effective in strategic locations. Fuel-reduction thinning treatments must also be followed by controlled fire for best effectiveness. Fuel-reduction treatments are not appropriate in un-roaded and remote forest areas. We appreciate that the fuel-reduction treatments strategically focus on areas such as the Blue Springs Wildland Urban Interface and the National Forest boundary.

Although the Forest Service declined to analyze an Alternative that would allow fire to burn naturally on the landscape, the creation of strategic fuel breaks may provide opportunity for fire crews to safely utilize beneficial fire use in the event of a future wildfire. As noted above, this may enable tactics such as burn outs as part of wildfire management, increasing the opportunity for beneficial fire use on the National Forest.

Historic fire suppression is often cited as the cause of problems associated with the forests of the Wallowa-Whitman National Forest. Reintroduction of fire is perhaps the most important solution to the effects of past fire suppression, yet beneficial fire use remains under-utilized. Implementation of beneficial fire use remains challenging. However, we are optimistic that well-planned strategic fuel reduction treatments may set the stage for the increased use of beneficial fire.

It's also essential that fuel reduction treatments are planned to avoid wildlife connectivity corridors and important closed canopy habitats, particularly those found in moist forest habitats. Protecting the most fire-resistant trees (early seral tree species as well as large and old trees of all species) is also an important element. Again, we appreciate the Forest Service protecting all trees 21 inches dbh and larger on this project.

We support the prescribed burning proposed by the Forest Service for the Sheep Project.

We encourage the La Grande Ranger District to take a similar approach to the East Face Project---locating fuel reduction treatments strategically while protecting habitat connectivity across the landscape.

Soil Impacts and Mechanized Equipment

We appreciate that cut-to-length logging systems would be used for units identified having soil displacement

concerns. As stated in the silviculture report, "The cut-to-length approach is known to reduce soil disturbance normally associated with whole tree logging, due to the creation of common use trails, slash mats, the machine's ability to utilize existing road systems, and through reduced use of traditional landings."

We have become increasingly concerned about the impacts of whole-tree skidding systems as we've seen the results of this type of logging in the National Forest. Particularly in moist forests, we've seen very large amounts of slash accumulate near the landings. These large slash piles burn very hot and have a significant impact over a large footprint of forest soil underneath.

We encourage the Forest Service to minimize soil displacement and compaction effects of mechanized equipment to the greatest extent possible on all logging treatments and all mechanized non-commercial thinning and fuel reduction treatments.

We encourage the Forest Service to utilize hand crews for non-commercial vegetation treatments as much as possible. Hand crews reduce impacts to the soils, create less collateral wounding of residual trees, and create employment opportunities.

Tethered Logging

We do not support the use of tethered logging for this project. Tethered logging would use ground-based logging equipment on steep slopes. Steeper slopes are more vulnerable to soil compaction, rutting, and soil displacement. Steeper slopes are at a higher risk of water runoff and soil erosion due to ground disturbance from logging equipment.

Cable or skyline logging does result in impacts to the soil, however the results are less detrimental to soils than those of ground-based equipment, according to research and monitoring efforts. Cable/ skyline logging is permitted for logging on steeper slopes by the Wallowa-Whitman National Forest Land and Resource Management Plan.

A Forest Plan Amendment would be required for logging with ground-based logging equipment on slopes steeper than 30%. We believe this project would better meet its Purpose and Need without requiring an amendment to the Wallowa-Whitman National Forest Land and Resource Management Plan.

The Preliminary EA is unclear on how many acres of tethered logging are being proposed.

Regardless, we encourage the Forest Service to follow the Wallowa-Whitman National Forest Land and Resource Management Plan without an Amendment to allow ground-based logging machinery on steep slopes.

The Preliminary EA states, "This amendment would allow us to closely monitor and understand the capabilities and limitations of tethered logging on our forest and aligns with purpose and need elements 5 (Economic Support) and 6 (Forest Partnerships)."

Purpose and Need element #5 describes a number of potential social and economic benefits for the local community where GHCC is based. This includes forest products of economic value as well other ecosystem services provided by the National Forest. We support projects that generate forest products if, and only if, the forest products are produced with ecological benefits and minimization of negative environmental impacts. We do not support the use of a Forest Plan Amendment that would produce additional negative impacts to forest soils.

Purpose and Need element #6 describes enhancing understanding of alternative forest practices, however, it also addresses the need to "build trusting relationships." GHCC was a founding member of the National Forest collaborative groups that have since become known as the Northern Blues Forest Collaborative. We participated

in the development of the Sheep Project with the Forest Service and the Collaborative from the project's beginning several years ago. GHCC left the Collaborative in 2020 due to several significant concerns. The new proposal to include the Forest Plan Amendment allowing tethered logging was added after GHCC left the Collaborative, and it was not mentioned in the Sheep Project Scoping Notice of February 14, 2020. As described in the introduction to these comments, we have very much appreciated the La Grande Ranger District's efforts to keep the public informed during the development of the Sheep Project. And while we understand that the Forest Service has introduced this proposal for a Forest Plan Amendment in response to issues apparently raised more recently, we must oppose this proposal. We must state that moving forward with tethered logging for this project will be problematic for the trusting relationship that has been built by working with the La Grande Ranger District during recent projects.

Large and Old Trees

In our scoping comments we requested protection of all large trees and all old-growth trees regardless of size or species.

We very much appreciate that the Forest Service eliminated from detailed study an alternative that would have cut large trees (defined as 21" dbh). We agree that there is a deficiency of large trees in the project area forests due to historic logging, that logging large trees would not move the forests toward desired conditions identified in the Forest Plan, and that logging large trees would not help meet the Purpose and Need of the project.

We also respectfully encourage the Forest Service to also protect as many old trees as possible, regardless of size or species. Older trees are deficient in the landscape. Old trees develop unique structures valuable to wildlife, and these structures require many years to develop. Protection of old trees in the silvicultural prescriptions would enhance the value of this project for wildlife and forest structure.

Connectivity of Wildlife Habitat

We encourage the La Grande Ranger District to follow the approach used on the East Face Project to protect connectivity. We believe the East Face Project successfully met economic, social, and ecological goals while also protecting wildlife habitat connectivity. We encourage a similar approach for the Sheep Project.

We strongly encourage the Forest Service to adopt the vegetation treatments that best protect habitat connectivity across the project area. Please locate logging units, non-commercial treatments, and fuel reduction treatments away from connectivity corridors as much as possible and modify prescriptions within connectivity zones.

We very much appreciate that wildlife habitat connectivity and permeability are an important component of the "Purpose and Need" for this project.

As we wrote in our scoping comments, "One of GHCC's top concerns is the impact of agency management activities on wildlife connectivity. For many of our native wildlife species, survival depends on movement - whether it be day-to-day movements, seasonal migration, gene flow, dispersal of offspring to new homes, recolonizing an area after a local extirpation, or the shift of a species' geographic range in response to changing climate conditions. For most animals and plants, all of these types of movement require a well-connected natural landscape. See Western Governors' Association's, Wildlife Corridors Initiative (June 2008 report), p.2.2 There is abundant scientific evidence that loss of habitat connectivity has profound negative impacts on fish, wildlife and plant populations. Id. at 3 (citing Wilcove et al. 1998, Crooks and Sanjayan 2006). Alarming, habitat loss and fragmentation is a cause of decline for about 83-percent of U.S. species. Id. at 4 (citing NatureServe and TNC 2000). As climate change accelerates and increases, protecting habitat connectivity is widely recognized as one of the best adaptation measures managers can take. This vital role that habitat connectivity plays in ensuring long term species' viability and the disastrous effects of habitat fragmentation has inspired a growing call to action to address these issues through big-picture collaborative efforts. A primary example is the Western

Governors' Association's (WGA) recent adoption of Policy Resolution 07-01 (adopted February 27, 2007), Protecting Wildlife Migration Corridors and Crucial Habitat in the West and preparation of the Wildlife Corridors Initiative (June 2008 report).

Connectivity needs to be considered for a wide variety of organisms, ranging from those extremely limited by mobility to big game. Movement to and from large core habitat areas should be consciously planned for. All roadless areas, even areas under 5000 acres, should be protected. The functionality of riparian areas as wildlife corridors should be considered. While not all species would be covered by this approach, riparian areas are likely natural wildlife corridors where extra-large buffers or some other approach would help plan for day-to-day wildlife movement and dispersal needs.

<https://www.nature.nps.gov/biology/migratoryspecies/documents/WGAWildlifeCorridorsInitiative.pdf>

Alternative 3

We appreciate that the Forest Service developed and analyzed a No Action Alternative, a Modified Proposed Action Alternative, and a Reduced Action Alternative.

Alternative 3 was developed by the Forest Service to address the key issues of treatments in OFMS, treatments in RHCAs, and connectivity.

We are particularly grateful that Alternative 3 provides for protection of wildlife habitat connectivity. Please see our comments on connectivity below. As stated above, we believe that the East Face Project provides a good model for protecting connectivity while also accomplishing silvicultural and fuel reduction goals.

We encourage the Forest Service to utilize the decision space provided by Alternative 3 to protect the most ecologically sensitive forests to the greatest measure possible.

Shelterwood (HSH) and Armillaria

The Preliminary EA describes whole tree extraction from sites infected with Armillaria root disease to move the extracted trees to nearby stream restoration sites. The Armillaria fungus is known to survive for years in roots and stumps. There would seem to be a significant risk of transmitting the root decay disease to the stream restoration sites by transporting trees from sites with known Armillaria infections. Please consider this in the Sheep project analysis.

Expanding OHV Use

We do not support expanding OHV impacts as presented in the Preliminary EA for the Sheep Project.

The Preliminary EA proposes changes to the Winom-Frazier OHV trail system including "formalizing existing ATV routes" for 6.3 miles and "designating new OHV routes" for 6.98 miles.

The Preliminary EA is not clear about the current status of the 6.3 miles of "existing ATV routes". It is not clear if these existing routes have been developed by the Forest Service through a previous environmental analysis process that identified and analyzed potential environmental impacts, or if these existing routes are user-created routes that are proposed to be "formalized" by the Sheep Creek Vegetation Management project.

It appears that the 6.98 miles of "new OHV routes" are not currently authorized routes of the Winom-Frazier OHV trail system.

It is not clear what types of tree-cutting, ground disturbance, or other activities (if any) are being proposed to formalize routes or designate these new ATV routes.

The Preliminary EA does not seem to analyze in a meaningful way the environmental impacts of expanding OHV use in the Project Area.

The Recreation Report states, "Since the construction of new recreation facilities or reconstruction of existing recreation facilities is not proposed for Sheep Creek, this report focuses on the harvest activities and fuel treatments and their effect on the recreation setting, visitor opportunities, and OHV trail improvements."

As such, it does not identify or analyze impacts from expanding OHV trails and traffic in the area and how this might affect resources including elk security, wildlife habitat, habitat connectivity, water quality, soils, non-motorized recreation, and more.

The Project Design Criteria (Table 8) does not seem to address expanding OHV use.

Our scoping comments for the Sheep project requested that:

The forthcoming environmental analysis and decision for the Sheep Creek project must comply with the Travel Management Rule.

The decision for the Sheep Creek project should adopt the sustainable road system recommendation of the Wallowa-Whitman Travel Analysis Report and close and/or decommission the roads within the project area that have been identified as unneeded.

In order to make this project compliant, we request that the final decision for the Sheep Creek project include closure of cross county travel within the project area.

We also noted that, "The Wallowa-Whitman National Forest is one of a handful of forest service units that has failed to complete travel management. It has yet to even initiate the process. The Wallowa Whitman's failure to implement Subpart B of the Travel Management Rule negatively impacts forest resources and specifically this project area. The scoping notice identifies damage throughout the project area from motorized travel. 36 C.F.R. § 212 requires every national forest to designate a system of roads, trails, and areas that are appropriate for public use. Until the forest complies with this mandate, along with the mandate to minimize impacts from trail and area designations, they are in violation of the agencies' regulations for motor vehicles."

The Preliminary EA states that "Project level travel management" including cross-country travel and Subpart A of Travel Management was considered but eliminated from detailed study, noting that travel management issues are complex and "best addressed in an analysis dedicated to forest-wide travel management."

It's difficult to understand how these important travel issues are beyond the scope of the Sheep Creek Vegetation Management Preliminary Environmental Analysis, and yet authorizing the expansion of OHVs in the project area (apparently without analysis) is appropriate.

We believe that an area closure to cross country motorized travel for the project area is appropriate and necessary.

We believe that expanding OHV use on public lands without travel planning or closure of cross country travel is not appropriate.

The Preliminary EA states, "Unregulated use of off highway vehicles poses a risk to the establishment and spread of non-native species due to the movement of plant material on equipment and the ability to introduce these materials to random areas that are difficult to identify for treatment. Re-opening roads and opening up stands with fuel reduction treatments in the Sheep Creek project increases the potential for introduction and spread of invasive plant material." This is listed as a "measurable cumulative effect" of "recreation--OHV use" (Appendix D Cumulative Effects Analysis).

Without an area closure of cross country motorized travel, the opening of stands with fuel reduction treatments would be expected to increase cross country motorized use and potential impacts including the spread of invasive plants.

As noted above, GHCC has followed the development of the Sheep Project since its inception several years ago. The proposal to include an expansion of OHV use in the Sheep project seems to have been added to the project shortly before the Scoping Notice of February 14, 2020. The OHV expansion had not been presented to the public before that time.

We understand and respect the rights of recreational members of the public to advocate for their interests on the National Forests. However, the public also has a right to expect the Forest Service to perform an adequate review of the potential impacts of this type of proposal.

Please see the following sections on roads and elk habitat for additional context about the impacts of roads and motorized travel in the project area.

Roads

We support:

- Re-establishment of barriers at breached access points to closed roads
- Extension of the Trail Cooperative TMA closure to 3 days prior to archery season
- Interpretive signs on benefits of riparian treatments
- Signs near gates describing benefits, timeframes, and objectives

As stated in our scoping comments:

We request that an alternative is developed that does not use any temporary roads or any closed roads requiring reconstruction.

We request that previously undisturbed forest soils are protected from machinery, and that landings, skid roads and other project activities are limited to within the footprint of previous roads, skid trails, landings, or otherwise previously-impacted soils.

We recommend any potential units that can only be accessed with temporary roads either be dropped and considered as wildlife refugia, or be non-commercially treated by hand crews. We recommend the same regarding re-opening of closed roads, unless there are roads which are currently causing resource damage and that could be restored.

Finally, we request that any alternatives that propose temporary road building include a cost-benefit analysis of the purported benefits of the treatment weighed against the negative impacts to wildlife, soil structure, hydrology, from invasive weed spread from temporary road building and road reconstruction.

The impacts of building new temporary roads potentially create more damage to resources than the benefits of their use.

However, we greatly appreciate the Project Design Criteria (Table 8) for roads (SQ-14) to minimize and mitigate the negative impacts from temporary roads.

The Scoping Notice estimated new temporary road mileage to be 3.5 miles. We're disappointed that Alternative 2 proposes 4.45 miles. We appreciate that Alternative 3 proposes less new temporary roads at 3.03 miles, however, we would greatly appreciate efforts to reduce the footprint of new temporary roads even further in the final Decision.

We very much appreciate and strongly support the proposal to:
close 3.45 miles of road and
decommission 0.16 miles of roads in the Sheep Project.

We very much appreciate and strongly support the plans to implement the existing management direction for roads in the Rooster Vegetation Management Project.

We very much appreciate and strongly support the Forest Service proposal to create and post maps to inform the public about open and closed motorized routes.

Elk Habitat

Excessive open roads negatively affect elk habitat by increasing disturbance, reducing security, reducing the effectiveness of cover, and taking land out of production.

In our scoping comments we requested that the distance band approach be used for the project analysis. We very much appreciate that this approach was used in the EA in addition to the Habitat Effectiveness Index (HEI) Model.

This analysis found that most of the project area (91.8%) is within 0.5 mile from an open road and is therefore considered "low" elk security. Only 23 acres of the 29,953 acre project area are greater than 1.5 miles from an open road and considered "high" elk security. This is only 0.1% of the project area. The nearby North Fork John Day Wilderness likely provides high security, however the lack of security in the project area would be expected to negatively affect elk distribution within the project area. Elk migrate across the landscape seasonally and opportunistically, and they also need connected habitat for forage, cover, and security. Therefore, it's essential for elk to be able to access quality, connected habitat across the Sheep Creek project area.

The Sheep EA Transportation Report shows that open road density in the project area would continue to exceed Forest Plan direction in three Management Areas after treatment. This is shown for both Alternative 2 and Alternative 3. The areas with excessive road densities would be Management Area-3 in the Chicken Creek Subwatershed, Management Area-3 in the Sheep Creek Subwatershed, and Management Area-1W in the Sheep Creek Subwatershed.

Management Area-1W in the Chicken Creek Subwatershed would improve to meet Forest Plan direction due to road management to be implemented under both Alternatives 2 and 3. We very much appreciate this improvement.

However, the Transportation Report states, "There are existing non-system roads on the ground from past activities including abandoned logging roads, user built two tracks, and roads on private land. These non-system roads are not a part of the recognized transportation system and are not accounted for in this report."

Also, it would appear Maintenance Level-1 Roads are not included in this analysis, including those being used as open OHV trails--either those currently in use or those proposed for expansion of the OHV trail network. It's also likely that some Maintenance Level-1 Roads in the project area have been breached and are being used by motorized vehicles.

It is safe to assume that the impacts of roads in the project area are greater than shown in the Analysis due to motor vehicle traffic on Maintenance Level-1 Roads, other non-system roads, motorized trails, and cross country motorized vehicles.

This analysis illustrates the impacts of an overly-roaded landscape to an important wildlife species--elk. Project activities are going to adversely affect cover and therefore elk habitat which further underscores the importance of closing additional roads, travel management planning, closing cross country motorized travel, and planning for wildlife security within the project area.

Livestock Grazing

The following are "measurable cumulative effects" related to livestock grazing listed in the Sheep Creek Vegetation Management Project Appendix D Cumulative Effects Analysis.

"Cottonwood has the potential to be impacted by grazing; fencing will be used to mitigate this potential effect. Reducing canopy cover could increase forage availability, increasing grazing activities. Heavy grazing activities could reduce food availability for the intermountain Sulphur and Western bumblebee.

Harvest, fuels reduction work, and prescribed burning has the potential to make areas not previously accessible to cattle accessible; however, there is such limited entry into RHCAs that this is not expected to increase potential for impacts to riparian areas and water quality from grazing. INFISH S&Gs and WWNF utilization levels minimize cattle impacts to aquatic habitat.

Grazing impacts could occur if the timing of grazing was during late spring or early summer. It is possible that Sheep Creek project activities such as harvest and prescribed burning could open up suppressive vegetative cover and promote the plant's growth, abundance and vigor making it both more available and desirable to livestock. As with the majority of sensitive plant species, conclusive information as to their growth habits and how various influences (natural and human) may benefit or negatively impact is largely unknown. Timing of grazing is an activity within the control of grazing allotment administration and can be incorporated into annual operating instructions if monitoring indicates an adverse impact.

Cattle are vectors for invasive plant seeds. Opening up the forest with fuel reduction practices along with creating seed beds through ground disturbance increases the potential for cattle to transport noxious weed seeds into new areas and increase spread."

Please develop project design criteria to protect National Forest resources from these impacts and other potential impacts of livestock grazing in the project area.

Conclusion

Thank you very much for reviewing and considering our comments. We appreciate the opportunity to participate in this planning process. We look forward to working with the Forest Service as this project moves forward.

Please feel free to contact me with any questions or to discuss the Sheep Creek project.

Sincerely,

Brian Kelly

Brian Kelly, Restoration Director

Greater Hells Canyon Council

La Grande, OR