

4SEP21

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Subject: Preliminary Environmental Assessment – Sheep Creek Vegetation Management Project

It is my experience that the WWNF has more blowdown and deadfall trees than any of the other National Forests that I have visited in the western United States. As such, I am generally supportive of this project. It both enhances the environment in the project area, and reduces the large fire potential of the area. However, with that said, after reading the Preliminary EA, I have a number of issues that I would like to see addressed in the final decision. I will detail my concerns on a page by page basis below.

Pages 13 & 14, Table 4

A) The EA does not address any of the roads that our local OHV clubs identified as routes that we would like to have added to this project as new OHV trails. These potential trails are identified in yellow on the OHV trail map here:

http://www.fs.usda.gov/nfs/11558/www/nepa/113131_FSPLT3_5659072.pdf

Please address this in the final decision.

B) At the bottom of page 13, and the top of page 14, I believe you have a typo, and meant to say Trail “Creek” Cooperative TMA.

C) On Table 4 on page 13, it shows the 5182-035 road as part of a new OHV trail. Forest Order 318-01 encompasses this road, and it will need to be rescinded or revised for this part of the EA proposal to go forward. Additionally, I did not see any time frames annotated in the EA. There are no reasons why the new trails cannot go into effect immediately upon completion of the NEPA for this project. There are plenty of volunteers ready to help create these new trails, and with minimal cost to the WWNF. The EA needs to detail how long this project will take to complete, and when is it expected that the new OHV trails will go into effect.

D) The proposal states that the intent is to extend the Trail Creek TMA closure to include Archery season, in order to increase big game security and distribution. I would like to point out a number of issues with this.

1) The sheep creek project only overlaps the Trail Creek TMA by about 100 acres, but the proposal would close the entire 29 square miles of the TMA by an additional 2 months, or 60 days. Due to snow cover, most years the TMA is only accessible by motor vehicles from about memorial weekend/June 1st, to about November 15th. This equates to a 5 ½ month period that motor vehicles can currently access the area, and this proposal would decrease that down to only 3 ½ months of the year. If implemented, this would result in a substantial loss of motor vehicle use on those 29 square miles within the TMA.

2) The TMA boundaries are nowhere close to any agricultural private properties, and any displacement of elk that may occur is onto WWNF lands.

For a number of years, I have been putting up trail cams within the Trail Creek TMA. These cameras are deployed as soon as the snow melts, and left out until after the rifle bull season has ended. The cams show that during archery season, 6 point bulls are using the ML-1 “discouraged use” roads, the day after, and sometimes within hours the same day, of OHV vehicles using the same road. The cams are also showing that in most years, the majority of the elk are leaving the area sometime after the rifle buck season has ended, but before rifle elk season starts. This happens to coincide with all the grass having turned brown, and the snow starting to fly. The bottom line is that the limited amount of OHV use in the TMA during September is not causing an issue with elk security.

3) Starting in 2022, all archery elk hunting in the Starkey unit will be by permit only. The ODFW permit numbers to be issued for Starkey is a reduction of over 300 hunters less than the historical level for archery elk hunters. Implementing the change to the TMA start date, combined with the reduction in tags/opportunity, will result in a double penalty for the existing archery hunters who currently are already using this area.

4) Implementing the TMA start date to include archery season will only encourage more of the hunters who do happen to get drawn for a Starkey elk tag, to congregate in the Trail Creek TMA. Please refer to my comments under Page 145 Access on page 4 below, for the explanation of why the archery elk hunter numbers will increase. If the proposed start date changes to the TMA are left in place, language should be included in the final EA that the number of bowhunters using the TMA is expected to increase.

5) There is a private land parcel within the eastern Portion of the TMA. The road to the property is closed right before rifle bull season. Implementing the new proposed start date for the TMA would close their access road for an additional two months. Is the landowner going to be granted a special permit for access? If so, they will have rights and privileges that the rest of the public won't receive. If the start date for the TMA is

changed to August, the EA needs to address this issue fairly and equivocally for all of the public.

6) There is also another private land parcel that butts up against the western edge of the TMA. During archery season, hunters who are associated with the private property, are driving their ATV's to the top of the ridgeline on their property. Having spent a couple of hours on multiple occasions hiking to the top of the ridgeline in the dark, it's most disconcerting to find ATV's already parked on the edge of the private property when I arrive at daylight. Because of this, I no longer go in there on foot, but if the new start date proposal goes into effect, it will create an unlevel playing field for those of us relegated back to hiking in to that area on foot. This would be another issue the EA needs to address.

7) The 2012 WWNF travel management plan was withdrawn for a number of reasons. I want to make it absolutely clear here that I am not accusing anybody of anything whatsoever, but the reality of the situation is, that between the recent change of the Indian Creek Gorham Butte TMA start date to include archery season, and now with the proposal to change the Trail Creek TMA start date to include archery season, it amounts to a back door closure of roads that are supposed to stay open until the new WWNF travel management plan has been put in place, and it circumvents that entire process. Addressing any changes to the Trail Creek TMA start dates should be left out of the scope of this project, and addressed at a later time by the new WWNF travel management plan when it comes out.

Page 26 SQ14 at the top of the page

It mentions that upon completion of use, all temporary roads disturbed surfaces are to be covered with slash. It does not specify the treatment for closure of permanent roads, but the final EA should include language to address that slash is not to be used on permanent roads that are put into storage. There are a number of roads within the WWNF where slash has been used in the past, and it makes it difficult, if not next to impossible, to use these stored roads by wheelchairs, foot hunters, hikers, horses, game carts, mule carts, bicycles, and all other forms of non-motorized transportation.

Page 35 Rec 1 Dispersed Camping

Additional language needs to be included in the EA such that adequate space is left for large RV's to turn around safely. This would include hairpin turns on roads. The intersection of 5182 and 5182-035 is an example. This would also benefit logging trucks use of the road during the project.

Page 87 Table 40

There appears to be typos in the “Acres” columns. As in some digits are missing.

Page 89 Cumulative effects

I've addressed the elk security statement above on Page 2, Item 2.

Page 135 Table 64

Road 5182-035 is going to be turned into an OHV trail with this project. If the culvert is removed, the EA needs to address the method OHV's are to use in order to cross the East Fork Sheep Creek crossing.

Page 145 Access

It states that by changing the TMA start date, it could lead to more people concentrating on a smaller network of roads. That may be true, but not for the reasons assumed. Rifle elk hunters and archery elk hunters have different needs and mindsets. Most, but not all, rifle elk hunters will not hunt far from their vehicles, and are more inclined to stay in their vehicles. Archery hunters look at the hunting regulations road closure areas, and think “oh, the hunting there must be good”, and flock to the area like flies to a cow pie. So yes, the open green dot roads may see increased travel during archery season, but it will be due the increased number of bowhunters flocking to the area and throwing on their packs.

Thank you for the opportunity to provide comments on the Sheep Creek EA.

Sincerely,

David M. Thiesfeld

La Grande Oregon