

Comments on the Camp Lick Project Preliminary Environmental Assessment

From:

Date:

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To: Blue Mountain Ranger District
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The proposed Camp Lick Project is within one of the top three priority watersheds identified by the Forest Service for aquatic restoration on the Malheur National Forest to improve habitat for Threatened Mid-Columbia River Steelhead trout and improve water quantity and quality into summer. Yet the Forest Service is planning in their proposed alternative 2 to remove 25-35 million board feet of timber over 12,430 acres through their Camp Lick Project timber sale, including riparian and upland watershed “restoration treatments” that include commercial logging within Riparian Habitat Conservation Areas (RHCAs) and stream headwaters. Such logging and heavy equipment use within RHCAs and near creeks could reduce needed shading to keep water cool enough for Threatened-listed Mid-Columbia Steelhead trout, to retain water flow for Sensitive Western Ridged mussel, and to retain moisture around the stream for Sensitive Columbia Spotted frog. Logging and heavy equipment use in RHCAs could also destabilize stream banks, causing erosion and sedimentation of the creeks harmful to fish. There would also be 70.2 miles of log hauling on dirt roads within 300 feet of streams and construction of a “temporary” road that includes 200 feet located within the West Fork Lick Creek RHCA and 520 feet of road within a Category 4 (intermittent) stream RHCA, which are likely to also contribute fine sediment to the creek and stream that could choke out Steelhead trout or Redband trout. Nine of the proposed “temporary” roads are within 100 feet from the stream RHCA. The Forest Service is also planning to reopen 3.8 miles of closed road segments that are already hydrologically connected to streams, potentially introducing fine sediment that could choke out fish, instead of decommissioning them so that they are no longer hydrologically connected. I’m asking the Forest Service to cancel their plans for commercial logging in RHCAs and headwaters of streams, to drop planned re-opening of closed roads and construction of “temporary” roads, especially where they are near streams or creeks or are within RHCAs, and in general to scale back proposed logging, road construction and use, and heavy equipment use, including in riparian restoration, to better protect critical fish habitat and other aquatic species such as the Columbia spotted frog, the Pacific lamprey, and Western ridged mussel.

I am very concerned by the proposed Forest Plan amendment that would log large trees equal to and greater than 21” dbh in violation of existing Forest Plan direction to protect large tree structure due to the severe regional deficit in large tree structure from past logging of large trees. Large tree structure is critical to the habitat needs of many increasingly rare species across the Malheur National Forest, including Pileated woodpeckers, American marten, Northern goshawk, and potential Pacific fisher. I also object to the Forest Plan amendment to allow the logging of late and old structure stands (old growth) in violation of existing Forest Plan standards to protect late and old structure stands which are at a great deficit compared to historic conditions due to past logging. Many species are dependent on old growth stands with large live trees, large snags, large logs, and complex structure, including the species named above. Pileated woodpeckers, American marten, and Northern goshawk are Management Indicator species that represent the habitat needs of a whole host of other species that require large trees and old growth structure. I want the Forest Service to drop both of these Forest Plan amendments and to cancel plans to log newly designated Replacement Old Growth areas (ROGs) and Dedicated Old Growth areas (DOGs) that would be partly or wholly re-designated. While I appreciate and support proposed increases in Dedicated and Replacement Old Growth Areas and designation of Pileated woodpecker

Feeding Areas (PFAs), none of the above old growth-associated species benefit from the commercial logging of these areas, which degrades their habitat suitability. Therefore I request that changes be made to the Forest Plan amendment for re-designating or designating new DOGs, ROGs, and PFAs that cancel planned logging in these areas. I am concerned that repeated Forest Plan amendments that effectively violate existing Forest Plan standards, such as the amendments to log large trees and within Late and Old Structure forest, are being repeated across the Malheur National Forest and are causing significant cumulative loss of large tree structure and complex old growth habitat. These are not really site-specific amendments as they are being repeated in various sales and across different conditions across the landscape.

The Camp Lick Project warrants a full Environmental Impact Statement due to likely significant impacts to ecological functioning and wildlife species from its large scale, cumulative impacts with other similar adjacent and nearby timber sales. These include the Magone, Ragged Ruby, Big Mosquito, and County Road 18 timber sales, which are all being implemented within the same general area of the Blue Mountain Ranger District, often with adjacent or nearly adjacent boundaries, and within the same general timeline for implementation, creating extensive cumulative effects that are not being analyzed. The Camp Lick Project EA should have included a full range of action alternatives, not just the No Action Alternative and the Forest Service proposed Alternative 2. I would like serious consideration of other alternatives that do not include logging of large trees, logging in Late and Old Structure stands, logging of Replacement and un-designated Dedicated Old Growth Areas, and logging within RHCAs, and focuses instead on ecologically sound aquatic restoration and small tree thinning up to 8-10" dbh and/or prescribed burning for restoring riparian hardwood trees and shrubs and thinning denser young tree growth from past logging and possible wild fire suppression. Otherwise I can only support the No Action alternative, which does not include any needed restoration actions such as road closures.

I am also concerned by the large cumulative loss of forest thermal and hiding cover for Management Indicator Rocky Mountain elk and for Mule deer and Columbia White-tailed deer due to the combined impacts of the Camp Lick, Magone, Ragged Ruby, Big Mosquito, and County Road 18 timber sales. The Camp Lick area includes 1,900 acres of elk priority area, which includes an elk nursery area. It further concerns me that these five timber sales will also cumulatively reduce existing and future snag habitat for primary cavity excavator woodpeckers over a large partially contiguous area over a long consecutive time period, yet these cumulative effects to elk, deer and woodpeckers were not adequately analyzed in the Camp Lick Environmental Assessment.

I am asking the Forest Service to drop any logging on steep slopes and to drop commercial logging sale units with higher existing soil impacts or sensitive soils, such as sale units 148.2, 254, and 414. I am also concerned about heavy equipment and prescribed fire impacts to undiscovered populations of sensitive and rare plants, as the EA acknowledged repeatedly that it is likely there will be impacts to undiscovered sensitive and rare populations. I am concerned that so much ground disturbance will create bare ground conducive to invasive plant introduction and increase vectors for invasive plant dispersal, which also threatens native rare plants. Finally I request that the identified 1,790 acres of undeveloped land that would be lost to logging and the 60 acres of undeveloped land that would be lost to "temporary" road construction be completely dropped from logging and roading, since there is only 8,150 acres of un-logged and un-roaded lands left in the planning area, with 31,850 acres already sacrificed to roads and logging.

Thank you for consideration of my comments.

Sincerely,